



# COMMONWEALTH of VIRGINIA

## DEPARTMENT OF TRANSPORTATION

14685 Avion Parkway  
Chantilly, VA 20151  
(703) 383-VDOT (8368)

GREGORY A. WHIRLEY  
COMMISSIONER

September 30, 2010

Mr. Stephen Gardner, Project Manager  
County of Loudoun  
Department of Planning  
1 Harrison Street, S.E.  
P.O. Box 7000  
Leesburg, Virginia 20177-7000

Re: Dulles World Center  
Loudoun County Plan Number ZMAP 2008-0018, SPEX 2010-0008

Dear Mr. Gardner:

In accordance with the Virginia Traffic Impact Analysis Regulations, 24 VAC 30-155, the above referenced application and related supplemental traffic analysis were received by the Virginia Department of Transportation (VDOT) for review on August 18, 2010.

We have evaluated the application and related supplemental traffic analysis and prepared comments on the results of our evaluation. The comments present our key findings as well as detailed comments on the future transportation improvements which will be needed to support the current and planned development in the study area.

The Traffic Impact Analysis is generally acceptable and VDOT will not require another submittal. However, the Analysis contains certain assumptions concerning roadway improvements that are currently unfunded, but are necessary for the roadway network to operate at acceptable levels of service with the proposed development. Specific comments relating to these unfunded roadway improvements and other concerns are contained in the attached Evaluation Report.

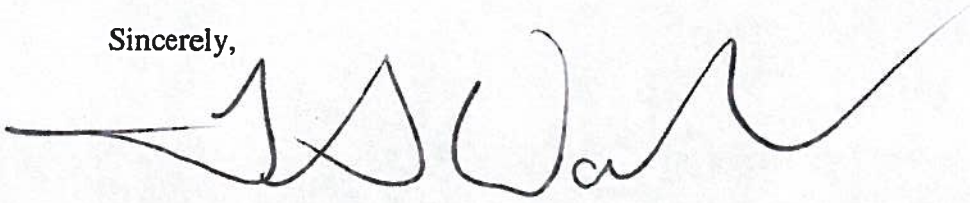
Our Evaluation Report is attached to assist the Loudoun County Board of Supervisors and the Department of Planning in their decision making process regarding the Zoning Map Amendment and Special Exception applications.



Please arrange to have these comments included in the official public records, and to have both this letter and the VDOT comments placed in the official file for this application. VDOT will make these documents available to the public through various means, and may post them to the VDOT website.

If you have any questions, please call me at (703) 383-2041.

Sincerely,

A handwritten signature in black ink, appearing to read 'T. B. Walker', with a long horizontal line extending to the left.

Thomas B. Walker  
Senior Transportation Engineer

Attachment (Evaluation Report)

## **DULLES WORLD CENTER EVALUATION REPORT**

September 30, 2010

The proposed Dulles World Center development is located east of Route 28, south of Old Ox Road, west of Rock Hill road and north of the Dulles Toll Road in the northeast quadrant of the Dulles Toll Road / Route 28 Interchange. The proposed development program for the approximately seventy five acre parcel consists of 1,495 residential units, 273 hotel rooms, 3,229,500 square feet of office space and 400,000 square feet of retail uses. The study area analyzed includes Route 28, Old Ox Road, Rock Hill Road, Sterling Road and Innovation Avenue and intersections along those roadways.

The analysis includes existing 2008 conditions, 2015 interim phase I development level, 2020 Interim Phase II development level, and 2030 full build out. Each of future year analysis is performed for background conditions without development and with development. Following are the comments on each phase:

### **Existing Conditions**

1. The existing conditions analysis shows that the intersections of Old Ox Road and Shaw Road, Old Ox Road and Oak Grove Road, Old Ox Road and Rock Hill Road, Sterling Road and Herndon Parkway and Route 28 and Innovation Ave have approaches that do not operate at acceptable levels of service during one or more of the peak periods.

### **2015 Interim Phase I Without Development**

1. The traffic analysis for the 2015 interim conditions without development shows that the intersections of Old Ox Road and Shaw Road, Old Ox Road and Oak Grove Road, Old Ox Road and Rock Hill Road, Sterling Road and Herndon Parkway have approaches that do not operate at acceptable levels of service during one or more of the peak periods.
2. For the interim conditions without development following improvements are recommended by others as part of the analysis:
  - a. Widening of Old Ox Road / Sterling Road to six lanes
  - b. Addition of a northbound left turn lane at the intersection of Sterling Road and Herndon Parkway
  - c. Addition of southbound through lane and southbound right turn lane at the intersection of Sterling Road and Herndon ParkwayIn addition to the above improvements the following planned improvements are also considered:
  - a. Planned interchange at Route 28 and Innovation Avenue
  - b. Addition of traffic signal at the intersection of Old Ox Road and Oak Grove Road

Signal Timing adjustments are demonstrated at the following intersection:

1. Old Ox Road and Rock Hill Road
2. Sterling Road and Herndon Parkway

The analysis conducted with the above recommended and planned improvements shows that all the intersections operate at an acceptable level of service except the intersection of Sterling Road and Herndon Parkway. It should be noted that widening of Sterling Road between Herndon Parkway and Rock Hill Road and addition of the second northbound left turn bay and southbound through and southbound right turn lane at the intersection of Sterling Road and Herndon Parkway are not included in the Town of Herndon Comprehensive Plan.



### 2015 Interim Phase I with Development

1. The Phase I development will comprise of approximately 1,627,000 square feet of office space and about 106,964 square feet retail space. The Phase I development will generate approximately 2,040 and 2,339 total trips in the AM and PM peak hour respectively and 18,147 daily trips.
2. The traffic analysis for the 2015 interim conditions with development shows that the intersections of Old Ox Road and Rock Hill Road, Sterling Road and Herndon Parkway and Innovation Avenue and Road A have approaches that do not operate at acceptable levels of service during one or more of the peak periods.
3. The following mitigation measures are proposed to mitigate the traffic impacts:
  - a. Installation of a traffic signal at Innovation Avenue and Road A
  - b. Addition of a northbound left turn bay on site drive at the intersection of Innovation Avenue and Road A
  - c. Addition of a second WB left turn bay at the intersection of Old Ox Road and Rock Hill Road
  - d. Signal timing adjustments at the intersection of Old Ox Road and Rock Hill Road and Sterling Road and Herndon Parkway.

The proposed mitigations measures improve the operations at all the intersections except the Sterling Road / Herndon Parkway intersection. Signal timing modifications is a strategy appropriate for the short term and may not be the best for longer term analysis conducted for this development. VDOT generally operates signals within networks where the cycle lengths and progressions are determined by optimizing the performance of the network. It is not clear if the signal timing modifications were done for the individual intersection or for the network.

4. The lane configuration for future 2015 conditions shown in Figure 14 shows a two lane section for realigned Innovation Avenue east of the Road A. However, per the proffer statement the applicant is proposing to construct 4 lanes for the entire length of Innovation Avenue including the section in Fairfax County (It is noted the analysis does not reflect this).
5. Per the traffic analysis conducted, in addition to the mitigation measures proposed above the following major improvements are assumed to be completed by 2015:
  - a. Planned Interchange at Route 28 and Innovation Avenue - The traffic analysis assumes that 80% of the site traffic will use this interchange. **Since this interchange provides access to more than 80% of the site traffic it should be constructed concurrently with occupancy of the phase I buildings.**
  - b. Note) It should be confirmed that the design for the interchange at Route 28 and Innovation does not preclude the future expansion of Route 28 to 10 lanes.
  - c. Widening of Route 28 to an 8 lane section between Dulles Toll Road and Old Ox Road. This improvement is included in the Constrained Long Range Plan (CLRP) but is currently unfunded.
  - d. Widening of Old Ox Road to 6 lane section - This improvement is included in the Loudoun County Comprehensive plan and is currently unfunded and is not included in the current VDOT six year plan or the CLRP. As such this improvement is unlikely to be in place by 2015.
  - e. Widening of Sterling Road between Herndon Parkway and Rock Hill Road and addition of the second northbound left turn bay at the intersection of Sterling Road and Herndon Parkway These improvements are not included in the Town of Herndon Comprehensive Plan, VDOT Six Year Program, or the CLRP. As such these improvements are not likely to be in place by 2015.

- f. The traffic analysis assumes that 20% of the site traffic will use Rock Hill Road to access the site. Rock Hill Road in its current condition may not be adequate to provide the access assumed in the study. It is suggested that the Shaw Road extension which is proposed by the applicant in the final phase in 2030 be accelerated to 2015 to provide an additional site access. This connection will help alleviate traffic on Old Ox Road as well as Rock Hill Road. (A Davis Drive connection from Old Ox to Innovation Ave. should also be considered at this Phase.)

Without the above major improvements the roadway network can't support the background, planned and the proposed level of development. Therefore, if the County decides to approve this development, it is our recommendation that the approval be subject to improvements being in place as assumed in the traffic analysis. An alternative phasing plan that indicates the level of development on site that can be accommodated without these improvements should be considered.

**2020 Interim Phase II Future Conditions with trips generated by adjacent Fairfax County APR nominations:**

1. The Phase II development will comprise of approximately 973 residential units, 273 hotel rooms, 2,443,000 million square feet office space and 237,487 square feet retail space. The Phase II development will generate approximately 3,378 and 3,871 total trips in the AM and PM peak hour respectively and 31,652 daily trips.
2. The traffic analysis for the 2020 interim conditions with development and trips generated by 30% of development by adjacent Fairfax County APR nominations shows that the intersections on Old Ox Road, Innovation Avenue and Rock Hill Road operate at an unacceptable level of service. The mitigation measures proposed include installation of traffic signals at the failing intersections on Innovation Avenue and Rock Hill Road and turn lane improvements. The analysis shows that the intersections of Old Ox Road and Rock Hill Road, Sterling Road and Herndon Parkway, Rock Hill Road and Biltmore Drive, Innovation Avenue and Road F and Innovation Avenue and Road H have approaches that do not operate at acceptable levels of service during one or more of the peak periods. (Note: Figure 25 does not depict the new signal proposed at the intersection of Rock Hill Road and Dulles Green Blvd. as indicated in the text on page 60).
3. In addition to the above proposed mitigation measures the traffic study assumes the following major improvements to be completed by 2020:
  - a. Planned Interchange at Route 28 and Innovation Avenue – Proffered by applicant.
  - b. Widening of Route 28 to 8 lane section between Dulles Toll Road and Old Ox Road. This improvement is included in the CLRP but is currently unfunded.
  - c. Widening of Old Ox Road to 6 lane section - This improvement is included in the Loudoun County Comprehensive Plan and is currently unfunded and is not included in the current VDOT six year plan or the CLRP.
  - d. Widening of Sterling Road between Herndon Parkway and Rock Hill Road and addition of the second northbound left turn bay at the intersection of Sterling Road and Herndon Parkway. These improvements are not included in the Town of Herndon Comprehensive Plan, VDOT Six Year Program, or the CLRP.

Without the above major improvements the roadway network can't support the background and the proposed level of development in 2020. Therefore, if the County decides to approve this development, it is our recommendation that the approval should be subject to improvements being in place as assumed in the traffic analysis. An alternative phasing plan that indicates the level of development on site that can be accommodated without these improvements should be considered.



## 2030 Full Build Out

1. The full build out of the development in 2030 will comprise of approximately 1,495 residential units, 273 hotel rooms, 3,279,500 square feet office space and 400,000 square feet retail space. At build-out the development will result in approximately 4,517 and 5,226 total trips in the AM and PM peak hour respectively and 42,768 daily trips.  
(Note: Trip generation analysis on page 23 indicates that internal capture reduction was considered for mixed use land bays. Land bays A and H have a single use. As such the internal synergy reduction used for land bay A does not apply).
2. The future 2030 conditions with full build out are evaluated with and without the proposed bridge over the Dulles Toll Road. For the analysis of 2030 conditions with full build out and without the bridge it is assumed that the Fairfax County parcels will be developed to the comprehensive plan level of development and with the bridge they are assumed to develop to the APR approved level of development. The County may wish to consider that for 2030 conditions without the bridge the analysis assumes the Fairfax County Parcels developed to the APR approved land use to be consistent with the assumptions used for with the bridge analysis.
3. The 2030 analysis with and without the bridge shows that the intersections along Old Ox Road, Sterling Road, Rock Hill Road and Innovation Avenue operate at an unacceptable level of service. With the proposed mitigation measures due to site the intersections along Old Ox Road and Sterling Road continue to operate at an unacceptable level of service.
4. In addition of the above proposed mitigation measures the traffic study assumes following major improvements to be completed by 2020:
  - a. Planned Interchange at Route 28 and Innovation Avenue – Proffered by applicant.
  - b. Widening of Route 28 to 10 lane section between Dulles Toll Road and Old Ox Road. This improvement is not included in the Constrained Long Range Plan.
  - c. Widening of Old Ox Road to 6 lane section - This improvement is included in the Loudoun County Comprehensive plan and is currently unfunded and not included in the current VDOT six year plan or the constrained long range plan (CLRP).
  - d. Widening of Sterling Road between Herndon Parkway and Rock Hill Road and addition of the second northbound left turn bay at the intersection of Sterling Road and Herndon Parkway These improvements are not included in the Town of Herndon comprehensive plan, VDOT Six Year Program, or the CLRP.
  - e. Construction of bridge over the Dulles Toll Road
  - f. Extension of Davis Drive to Innovation Avenue

Even with the above major improvements some of the intersections along Old Ox Road and Sterling Road continue to operate at an unacceptable level of service indicating the need for additional improvements in the area so that the road way network can accommodate the traffic generated by the background and the proposed development. Additionally, the cluster analysis of the three proposed developments conducted by VDOT using the travel demand model for the Inter-Jurisdictional working group concluded that additional access to the study area will be needed. New links such as a Davis Drive Extension to Innovation Avenue, an additional E-W link parallel to Old Ox Road, a Shaw Road extension, a Pacific Blvd. extension to Innovation Ave., and a new link connecting Centerville Road to Dulles Green Blvd. north of the Dulles Toll Road would provide additional accessibility to the metro station development area, and relieve the already congested sections of Route 28 in the vicinity of the Toll Road and help prevent significant delays and congestion on Route 606, Innovation Avenue, Rock Hill Road and Sterling Road in the future.

## Dulles World Center Evaluation Report, Page Five

These additional links are not included in the current comprehensive plans for Fairfax and Loudoun Counties. Therefore, if the County decides to approve this development; it is our recommendation that the approval be subject to improvements being in place as assumed in the traffic analysis. An alternative phasing plan that indicates the level of development on site that can be accommodated without these improvements should be considered.

### **Additional Concerns**

1. The traffic study assumes a Transit / TDM trip reduction of 31% for residential trips, 8% for Office and Hotel trips and 9% for retail trips for year 2020 and 2030. One of the components of the TDM program is a shuttle service from the site to the nearest metro station park and ride lots. As the site is partially located beyond half a mile of the Route 28 Metro station the shuttle service is a critical component of the TDM program to achieve the trip reductions.
2. To ensure that the Transit / TDM trip reductions are achieved an active monitoring program is recommended to measure the trips reductions achieved. The TDM program commitments need to be enforceable/ included in proffers.
3. As noted in previous reviews, all elements of any proposed public roads must meet the requirements of the VDOT Subdivision Street Acceptance Requirements, VDOT Road Design Manual, and the VDOT Access Management Regulations as applicable.

### **Summary:**

As shown in the traffic analysis and mentioned above significant improvements beyond those in the current comprehensive plan will be needed. The improvements in the current county comprehensive plan are assumed to be completed in the analysis performed for the various phases of the development. The majority of these long term improvements are currently unfunded and not included in the CLRP. The timing of these improvements is at best uncertain and may take several years before being constructed.

The cluster analysis of the three proposed developments conducted by VDOT using the travel demand model for the Inter-Jurisdictional working group concluded that additional access to the study area will be needed via new links such as a Davis Drive Extension to Innovation Avenue, an additional E-W link parallel to Old Ox Road, a Shaw Road extension, a Pacific Blvd. extension to Innovation Ave., and a new link connecting Centreville Road to Dulles Green Blvd. north of the Dulles Toll Road to provide additional accessibility to the metro station development area, to relieve the already congested sections of Route 28 in the vicinity of the Toll Road, and to prevent significant delays and congestion on Route 606, Innovation Avenue, Rock Hill Road and Sterling Road in the future. These additional links are not included in the current comprehensive plans for Fairfax and Loudoun Counties.

Without these major improvements the roadway network can't support the background and the proposed level of development in the area. If the County decides to approve this development, it is our recommendation that the approval should be subject to or contingent upon the completion of the long term transportation improvements assumed in the traffic analysis.

**This page is intentionally left blank.**





**LOUDOUN COUNTY, VIRGINIA**  
**Department of Fire, Rescue and Emergency Management**

803 Sycolin Road, Suite 104 Leesburg, VA 20175  
Phone 703-777-0333 Fax 703-771-5359



## Memorandum

**To:** Stephen Gardner, Project Manager  
**From:** Maria Figueroa Taylor, Fire-Rescue Planner  
**Date:** August 19, 2010  
**Subject:** Dulles World Center, third referral  
ZMAP 2008-0018 & SPEX 2010-0008

Thank you for the opportunity to review the third submission of the above captioned application. Although the Applicant agreed to demonstrate at site plan (and revised the proffer statement to reflect their commitment), staff remains concerned that adequate access, circulation and timely response of emergency vehicles would be compromised by the proposed densities, building height, associated traffic and the overall lay-out of the site.

If you have any questions or need additional information, please contact me at 703-777-0333.

c: Project file

**This page is intentionally left blank.**



## Loudoun County Health Department

P.O. Box 7000  
Leesburg VA 20177-7000




Environmental Health  
Phone: 703 / 777-0234  
Fax: 703 / 771-5023

Community Health  
Phone: 703 / 777-0236  
Fax: 703 / 771-5393

9 August 2010

**MEMORANDUM TO:** Stephen Gardner, Project Manager  
Department of Building & Development, **MSC 62**

**FROM:**  Matthew D. Tolley  
Sr. Env. Health Specialist  
Division of Environmental Health, **MSC 68**

**SUBJECT:** **ZMAP 2008-0018 & SPEX 2010-0008; Dulles  
World Center  
LCTM: 94((14)) A2B- A2E & B (PINs 035-26-2113,  
035-25-7745, 035-26-4587, 035-25-8897 & 035-49-  
8227)**

The Health Department recommends approval of this application. The proposal will be served by public water and sewer. No old existing on-site facilities exist that the Health Department would be concerned with. The plat reviewed was prepared by Gordon & Associates and was revised 8 April 2010.

Attachments Yes \_\_\_\_ No X

If further information or clarification on the above project is required, please contact Matt Tolley at 771-5248.

MDT/JEL/mt  
c:subdvgd.ref

ATTACHMENT 1i

A-229



**This page is intentionally left blank.**

PO Box 4000 | 44865 LOUDOUN WATER WAY | ASHBURN, VA 20146  
TEL 571.291.7700 | FAX 571.223.2910

September 7, 2010

Mr. Stephen Gardner  
Department of Planning  
1 Harrison Street, S.E.  
P. O. Box 7000  
Leesburg, Virginia 20177-7000

**Re: ZMAP-2008-0018, SPEX-2010-0003  
Dulles World Center**

Dear Mr. Gardner:

Loudoun Water has reviewed the referenced applications. Concerning the Draft Proffers dated July 30, 2010, we make two recommendations.

**1. Proffer XI.A. Water Service**

Loudoun Water's initial statement of January 23, 2009 on this matter is reprinted below for convenience.

*Initial development within Dulles World Center may receive water service by extension from Loudoun Water's main, which traverses the site. Given the extent of the proposed development, it will become necessary to provide a second supply, so as to ensure the reliability of service within this development. The anticipated second supply is by means of extension from existing main along Rock Hill Road. This main is currently terminated some 3200 feet northeast of Dulles Word Center.*

As currently drafted, the proffer suggests that the scope of necessary water improvements would be determined through an analysis of capacity, which the applicant would provide at time of the first site plan. The applicant is reminded that a second supply will be needed to establish reliable service, through two redundant lines. This will be required, regardless of the hydraulic capacity of any single supply.

An improved proffer might include text such as "including adequate redundancy", which might be inserted into the third sentence, after "...Applicant can provide sufficient water service...".

**2. Proffer XI.B. Sanitary Sewer Service**

Loudoun Water's initial statement of January 23, 2009 on this matter is reprinted below for convenience.

*Sanitary sewer service to the proposed development would be by means of extension from Loudoun Water's Horsepen Run Trunk Sewer, which traverses the subject parcels, and discharges to the Potomac Interceptor, which is operated by the District of Columbia Water and Sewer Authority (DCWASA). Flow from both Fairfax and Loudoun Counties is conveyed through this Horsepen Run Trunk Sewer. The capacity of this trunk sewer is limited, and is the subject of an agreement dated April 16, 1971, between the Loudoun County Sanitation Authority (now Loudoun Water) and Fairfax County. Loudoun Water's allotment is 2.5 million gallons per day of the facility's design flow.*



*The subject properties are within Loudoun Water's Horsepen Run Sewer Shed, which is generally bounded to the east by Fairfax County, to the north by Route 606, to the west by Route 28, and to the south by the Dulles Toll Road. Based upon the uses proposed, we estimate that at its build out, Dulles World Center alone would require more than the capacity that is currently available to Loudoun Water, though the subject properties occupy less than 20% of the sewer shed. Expansion of sanitary sewer facilities and allotted capacity would require the modification of the existing arrangements between Loudoun Water, Fairfax County and DCWASA.*

The draft proffer now acknowledges that the necessary capacity analysis would include allotments for all properties in the service area of the Horsepen Run Interceptor. However, the allotments offered are at "by-right densities". The densities that might be attained under the applicable comprehensive plans may well exceed current by-right densities. The necessary allotment for these properties must reflect said properties fully developed to densities permitted by applicable comprehensive plans and/or zonings. An improved proffer would assure that the analysis of capacity would allow for such planned densities, so that the development potential of other properties within the Horsepen Run Interceptor's service area will not be adversely impacted.

Public water and sanitary sewer service would be contingent upon the developer's compliance with Loudoun Water's *Rates, Rules and Regulations*; and Design Standards. Concerning offsite easements that will be required to extend public water to this site, the applicant shall be responsible for acquiring such easements and conveying them to Loudoun Water, at no cost to the County or to Loudoun Water.

Should you have any questions, please do not hesitate to contact me.

Sincerely,



Julie Atwell  
Engineering Administrative Specialist





**COUNTY OF LOUDOUN  
PARKS, RECREATION AND COMMUNITY SERVICES  
REFERRAL MEMORANDUM**

**To:** Stephen Gardner, Project Manager, Planning Department (MSC #62)  
**From:** ~~Mark~~ Brian G. Fuller, Park Planner, Facilities Planning and Development (MSC #78)  
**Through:** ~~N~~ Mark A. Novak, Chief Park Planner, Facilities Planning and Development  
**CC:** Diane Ryburn, Director  
Steve Torpy, Assistant Director  
Su Webb, Chairman, PROS Board, Catoctin District  
Jean Ault, Vice Chairman, PROS Board, Dulles District  
Robert C. Wright, PROS Board, Open Space Member  
James E. O'Connor, PROS Board, Open Space Member

**RECEIVED**

**AUG 10 2010**

**LOUDOUN COUNTY  
DEPARTMENT OF PLANNING**

**Date:** August 9, 2010

**Subject:** Dulles World Center (3<sup>rd</sup> Submission)  
ZMAP 2008-0018 and SPEX 2010-0008

**Election District:** Dulles **Sub Planning Area:** Sterling

**MCPI #** 035-26-2113, 035-25-7745, 035-26-4587, 035-25-8897 & 035-17-3774

**BACKGROUND AND ANALYSIS:**

The properties are generally bounded to the north by Innovation Drive, to the south by the Dulles Toll Road, and to the west by Route 28, near the planned Route 28/CIT Metrorail Station. The properties are adjacent to the Dulles International Airport and the Center for Innovative Technology (CIT). The sites are located in the Suburban Policy Area within the Dulles Election District and consist of approximately 75.12 acres. The Properties are currently zoned PD-RDP (Planned Development – Research and Development Park) under the 1972 Zoning Ordinance. The Properties are located within the Route 28 Highway Transportation Improvement District. The Applicant proposes to develop a mix of office, retail, hotel and multi-family residential housing in a mixed-use format. The proposed uses are 4,080,600 square feet of non-residential uses and 1,495 multi-family residential units. To support this program, the Applicant seeks to rezone the Property from PD-RDP to PD-TC (Planned Development-Town Center) and PD-OP (Planned Development-Office Park) in accordance with the provisions of the Revised 1993 Loudoun County Zoning Ordinance.

This is a third referral for ZMAP 2008-0018; ZMAP 2010-003 is now inactive. The special exception requesting a reduction in the number of required parking spaces and the minor special exception requesting an elimination of the landscape buffer applicable

to a hotel / motel use have both been withdrawn. A special exception (SPEX 2010-0003) to increase the Floor Area Ratio (FAR) in the PD-OP District has been retained.

## **POLICY:**

The subject site is governed under the policies outlined in the Revised General Plan, the Revised 1993 Zoning Ordinance, the Revised Countywide Transportation Plan (CTP), and the Bicycle and Pedestrian Mobility Master Plan (Bike/Ped Plan). The Property is located within the Sterling Community Suburban Policy Area. The Planned Land Use Map adopted with the Revised General Plan identifies the subject site as planned for Business.

The property is also located within the Route 28 Tax District. The Revised General Plan provides policy direction encouraging property owners within the Tax District to rezone to the approved zoning district regulations to provide consistent development patterns within the District. The Plan states "The County will look at incentives to encourage Route 28 Tax District landowners to opt into the Revised Zoning Ordinance." (Revised General Plan, Policy 14, p. 4-10).

It is anticipated that properties in the Route 28 Taxing District be developed or continue uses supportive of the District.

## **COMMENTS:**

The Department of Parks, Recreation and Community Services (PRCS) has reviewed the Applicant's responses dated July 30, 2010 to referral comments dated June 24, 2010, the revised CDP dated July 30, 2010, and the Proffer Statement dated July 30, 2010. The following is a summary of the current status of the comments identified by the Department of Parks, Recreation and Community Services (PRCS) on the last project review for ZMAP 2010-0003, SPEX 2010-0006, SPEX 2010-0007, and SPEX 2010-0008:

1. This project will potentially add 1,495 multi-family residential units and offers no contribution to public recreation. The Sterling subarea is presently and will continue to experience significant development. Additional development from new rezoning and by-right developments will place recreational facilities in further jeopardy from a capacity perspective. Developers of other subarea residential projects indicate in their applications that the area is supported by existing and planned public facilities, such as Claude Moore Park. However, residents from both by-right and rezoned subdivisions add a significant demand on existing recreation facilities which make it difficult to keep pace with respective service demands. This application alone will have an immediate impact on existing public recreational facilities in the area.



PRCS notes the limitations to residential development within project area, including noise and blasting from the Quarry, noise from Dulles International Airport, noise and traffic congestion from the Dulles Toll Road/Greenway and Route 28, and difficulty in access the site from Innovation Avenue and Rock Hill Road, and questions whether this type of development is appropriate in this location. Per the Revised General Plan, residential uses are not proposed and/or desired in this location. The site constraints also limit the development of any potential public use site within the development such as a public park.

PRCS notes the Applicant's proposed proffer contributions to the private community recreation needs of the future residents of this application. However, Staff still notes that these onsite amenities will not completely satisfy the recreational needs of the future residents of this project. The proposed onsite amenities will not completely mitigate the potential impact on existing County public recreational facilities. Future residents will require usage of public athletic fields, recreational and community centers, public hiking trails, etc. Therefore, PRCS recommends that the Applicant proffer to further develop existing public recreational facilities within the subarea of the project. Staff recommends earmarking a portion of the cash contribution specifically to a public parks and recreational improvement in the Sterling subarea.

The Applicant should demonstrate to Staff, the Planning Commission, and the Board of Supervisors how the public recreational and leisure needs of these new residents will be met without further taxing the existing public recreational facilities in eastern Loudoun.

*Applicant Response:* *The Applicant appreciates staff's recognition of the site constraints and acknowledgement that the Applicant has already agreed to provide the full contribution for capital facilities as well as provide significant amenities on site for the residents of Dulles World Center. Since the last submission, the Applicant has strengthened and diversified its commitment to recreational amenities on site and has included a proffer to phase those facilities with the residential construction. Furthermore, the Applicant has reviewed the County's Capital Needs Assessment and spoken with staff regarding park and recreational facilities within the Sterling subarea. Claude Moore Park, which is located proximate to Route 28 in the Sterling subarea, is the County's only recreation center and provides an abundance of passive and active recreational amenities for residents within the same planning area as the Property, according to staff and County records. Therefore, the most pressing need within the Sterling subarea is for a district park of 75 acres and community parks of 30 acres, neither of which could be accommodated within Dulles World Center.*

**Issue Status: Acknowledged.**



2. PRCS requests additional detailed information on any potential active recreation uses/amenities to be located within the Promenade (shown in Landbay G).

**Applicant Response:** *The land bays have been renamed with this submission and the Promenade is now located in Land Bays 7 and 8. Centered around a minimum 40,000-square-foot town green, the Promenade is designed to be a hub of civic and pedestrian activity at Dulles World Center. In addition to the Town Green, the Promenade will contain an additional acre of land that can either be programmed civic space or open space and additional details of the look and feel of those uses have been included in the proffers and design guidelines.*

**Issue Status:** Resolved.

3. PRCS notes that the Proffers and the Design Guidelines state that the Applicant will include private recreational amenities (courtyard areas/pocket parks/plazas, bicycle racks, community room, fitness center, swimming pool, and a least one tot lot. PRCS requests that the conceptual locations and sizes of these proposed amenities be delineated on the Concept Plan and explained in more detail within the Proffers.

**Applicant Response:** *The proffers have been updated as requested to include specific minimum sizes for the private recreational amenities listed above. It is too early to identify locations, even if conceptual, at this point, but the proffers have been revised to commit that all residents at build out will have access to at least one of every listed amenity.*

**Issue Status:** Resolved.

4. It appears that the Applicant is proposing to place portions of stream corridor and wetlands within open/civic space/tree conservation area. PRCS requests additional detailed information on any potential passive recreational uses (e.g., trails, etc.) within this open space (Land Bay A). In addition, Staff recommends that the open space have a Resource Management Plan (within the Sustainable Development Plan) that addresses the use, maintenance, target vegetation, wildlife management goals and methods, and other aspects of sustaining a functional and attractive natural, open space area. The management plan should also address how watershed protection is to be applied to ensure a healthy stream, diverse aquatic life, stable stream banks, and vibrant native vegetation. In addition, the management plan may also include opportunities and requirements for stream restoration.

**Applicant Response:** *The Applicant has included potential alignments of trails within the open space in Land Bay A. Should Land Bay A be bought or leased by a government contractor or federal agency that requires security setbacks, the trails would be for sole use of the tenants within that land bay. The Applicant has focused its attention on the Sustainable Development Plan to guide its environment initiatives throughout the Property and believes an additional Resource Management Plan is unnecessary. To that end, the Sustainable Development Plan identifies watershed protection measures, stream restoration principles, etc. Furthermore, the Applicant has replicated specific commitments discussed in the Sustainable Development Plan to the proffers.*

**Issue Status: Acknowledged.**

5. In conjunction with Comment 4, please revise Proffer V.A.2 to clarify whether the 12.82 acres identified as "open space" includes the Open Space and Tree Preservation Areas delineated on the Concept Plan in Land Bay A

**Applicant Response:** *The Open Space calculation has been clarified on the Concept Plan to show that the Property complies with the 10 percent requirement as specified in the Revised General Plan. Additional open space will be provided throughout the Property, including in the stream valley in Land Bay A. However, because no more than half of a Property's required open space can be located in the stream valley, per revised General Plan policy, the Applicant has not shown all of the open space that will actually exist in Land Bay A. The Tree Preservation Areas of 0.73 acres are included in the Open Space Easement.*

**Issue Status: Resolved.**

6. It appears that the Concept Plan shows potential impacts to stream corridors and/or wetlands, and that the Applicant has secured their proper permits. Staff also notes that Applicant's Sustainable Development Plan states that the wetlands mitigation should not occur onsite due to the potential conflict with birds attracted to the mitigation and airport flight traffic, per USCOE guidelines. However, Staff requests that the mitigation occur within the Broad Run Watershed per Loudoun County policy and not outside of Loudoun County.

**Applicant Response:** *As the comment recognizes, the Applicant has already purchased wetland credits to cover the projected impacts. Notwithstanding the above, the Applicant has revised the proffers as requested to prioritize the Broad Run watershed as the preferred geographic location to purchase credits should additional ones be needed.*

**Issue Status: Resolved.**

**CONCLUSION:**

PRCS has reviewed the Applicant's responses to the comments above and offers no further objection to the approval of this application.

If you have any questions or concerns regarding these comments, please do not hesitate to contact me personally via phone at 571-258-3251, or via e-mail at [brian.fuller@loudoun.gov](mailto:brian.fuller@loudoun.gov). You may also contact Mark Novak via phone at 703-737-8992, or via e-mail at [mark.novak@loudoun.gov](mailto:mark.novak@loudoun.gov). I look forward to attending any meetings or work sessions to offer PRCS support, or to be notified of any further information regarding this project.



## LOUDOUN COUNTY PUBLIC SCHOOLS PLANNING AND LEGISLATIVE SERVICES

21000 Education Court  
Ashburn, Virginia 20148  
Telephone: 571-252-1050  
Facsimile: 571-252-1101  
Email: lcpsplan@lcps.org

August 11, 2010



Mr. Stephen Gardner  
County of Loudoun  
Department of Planning  
1 Harrison Street, SE (MS #62)  
Leesburg, Virginia 20175

RE: ZMAP 2008-0018 & SPEX 2010-0003/Dulles World Center (3<sup>rd</sup> Submission)

Dear Mr. Gardner:

School Board staff has reviewed the third submission materials for the Dulles World Center zoning map amendment and special exception application. An updated assessment has been provided outlining the operational and capital impact of the Dulles World Center project on Loudoun County Public Schools.

The applicant has indicated in the Statement of Justification that the "schools which would serve the Property have sufficient capacity for the proposed development's students." While student capacity may be available at the identified schools [Forest Grove Elementary School, Sterling Middle School, and Park View High School], should the Dulles World Center application be approved it must be noted that the project would not be the only residential development to impact these schools. At present the School Board is poised to move the recently approved Kincora Village Center into the Park View cluster schools as a consequence of capacity issues in the Broad Run cluster. This change, in addition to any potential residential units associated with the Route 28 plan amendment, may have a significant impact on the Sterling schools ability to serve these approved and planned residential developments.

The availability of school capacity in the assigned attendance areas of Forest Grove Elementary School, Sterling Middle School, and Park View High School is thus a significant concern when reviewing the Dulles World Center application; school staff has discussed a variety of potential solutions at both the elementary and secondary school levels. Not only do student demographics within existing subdivisions change annually and over time, but other residential rezoning projects in the area which, should they be approved, will also affect the future enrollment and capacity of the aforementioned schools. Should the Dulles World Center application be approved, School staff will approach the School Board to potentially modify the current school attendance zones for the Dulles World Center property in order to assign the future school-age residents to neighboring school attendance areas which will have available student capacity.

Should you require any additional information, as a follow up to these comments or my referrals dated May 18, 2009 and/or December 16, 2008, please contact me at your earliest convenience.

Sincerely,

Sam Adamo, Director

### Attachment

c: Edgar Hatrick, Division Superintendent  
Loudoun County School Board  
(Site Location: Dulles Election District)

ATTACHMENT 11





# Loudoun County Public Schools

Department of Planning and Legislative Services

## Project Assessment

**Project Name: ZMAP 2008-0018 & SPEX 2010-0003/Dulles World Center (3rd Submission)**

2008 Virginia-County of Loudoun School Census Student Generation Factors		Housing Units	Elementary School Student Generation	Middle School Student Generation	High School Student Generation	Student Generation Total
Single Family Detached (SFD)	0.87	0	0	0	0	0
Single Family Attached (SFA)	0.51	0	0	0	0	0
Multifamily (MF)	0.26	1495	198	86	105	389
<b>Total Students</b>		<b>1495</b>	<b>198</b>	<b>86</b>	<b>105</b>	<b>389</b>
Capital Costs			Elementary School Cost (FY 2011 CIP)	Middle School Cost (FY 2011 CIP)	High School Cost (FY 2011 CIP)	Total Capital Expenditure
School Cost			\$25,920,000	\$44,110,000	\$87,750,000	
Capacity			875	1,350	1,800	
Per Pupil Cost			\$29,623	\$32,674	\$48,750	
<b>Project's Capital Costs</b>			<b>\$5,865,326</b>	<b>\$2,809,970</b>	<b>\$5,118,750</b>	<b>\$13,794,046</b>
Annual Operational Costs			FY 2010 Estimated Per Pupil Cost	Student Generation Total	Annual Operational Costs	
			\$11,997	389	\$4,666,833	
School Facility Information			Elementary School (Grades K-5)	Middle School (Grades 6-8)	High School (Grades 9-12)	
2010-11 School Attendance Zone			Forest Grove	Sterling	Park View	
September 30, 2009 Student Enrollment			563	851	1271	
2009-10 Building Program Capacity			575	1141	1356	

**County of Loudoun**  
**Department of Planning**  
**MEMORANDUM**

**DATE:** August 26, 2010  
**TO:** Stephen Gardner, Project Manager, Land Use Review  
**FROM:** Heidi Siebentritt, ~~Historic~~ Historic Preservation Planner, Community  
Information and Outreach

**SUBJECT: ZMAP 2008-0018, and SPEX 2010-0008, Dulles World Center**

The applicant has submitted all required archaeological reports for the subject properties and, upon review, there are no outstanding heritage preservation issues with this application.

**cc:** Michael "Miguel" Salinas, Program Manager, CIO  
Julie Pastor, AICP, Director

**ATTACHMENT 1m**

**This page is intentionally left blank.**

---

**COUNTY OF LOUDOUN  
PROFFER MATRIX TEAM**

**MEMORANDUM**

---

**DATE:** August 30, 2010

**TO:** Stephen Gardner, Project Manager

**FROM:** Proffer Referral Team

**THROUGH:** Daniel Csizmar, Capital Facilities Planner

**SUBJECT:** Proffer Referral Comments  
ZMAP-2008-0018, Dulles World Center



This memorandum is in response to your request for referral comments regarding proffered capital facilities submitted as part of ZMAP-2008-0018, Dulles World Center. This referral represents the combined comments of all County Departments with capital facility planning responsibilities.

**[Preamble]** Please revise the first sentence of the second paragraph of the preamble to specify that the property is being rezoned to PD-TC and PD-OP under the Revised 1993 Loudoun County Zoning Ordinance. Also, please revise the last sentence of the preamble that in the event the application is denied, the current proffers associated with ZMAP-1985-0009, the current approved application of record on the property, will be in full force and effect. The proffer statement incorrectly lists ZMAP-1989-0009.

**[Proffer I]** Please revise the first sentence of this proffer to provide that the Dulles World Center Zoning Amendment Plans are dated September 2, 2008, as revised through July 30, 2010. The sentence incorrectly states the Plan Set was revised through July 19, 2010, which does not match the date on the submitted plan set.

**[Proffer II.A.2]** Please be advised that Article 7 of the Revised 1993 Loudoun County Zoning Ordinance administers Affordable Dwelling Units (ADU's) only, and makes no mention of "workforce dwelling units" or how they should be administered. County housing policy included in the Revised General Plan does not sanction the use of the term "workforce housing," but identifies the County's unmet housing need for incomes below 100% of the Area Median Income (AMI, which is currently determined to be \$103,700). The proposed "workforce dwelling" units do not meet Article 7 requirements under the County's Zoning Ordinance. The County does not have a program by which the "workforce housing units" could be administered (no policy direction, program requirements, staff, etc.).

While County policy does not recognize "workforce dwelling units", it does identify that there are housing shortages for households with incomes between 0% to 100% of the Washington Metropolitan Statistical Area (MSA). For 2010, 100% of the Area Median Income (AMI) is



\$103,500. County Housing policy identifies unmet housing need for incomes up to \$103,700 and distinguishes that rental housing is needed for households with incomes up to 60% AMI (\$62,100) and for-sale units for incomes below 100% AMI. The proposed proffer states that either rental or for-sale housing will be built for incomes up to 100% AMI. Rental housing for incomes up to 100% does not fill an unmet housing need. The County needs multi-family rental housing units affordable to households with incomes up to 60% AMI (\$62,100) and needs them located close to transit. There is also a great need for accessible units and for lower cost units for households with incomes below 30% AMI. The proffers should include a commitment to universal design for units and specifically to lower cost units that provide housing for households below 30% AMI.

The following chart summarizes available units based on information in the County's Apartment Guide. It shows deficiencies in unit totals for incomes below 60% AMI & a large supply for higher incomes. This data is consistent with AECOM's analysis that the County needs rental units for lower income households.

#### **LOUDOUN COUNTY RENTAL HOUSING<sup>1</sup>**

<b>One Bedroom</b>	<b>Two Bedroom</b>	<b>Three Bedroom</b>
<b>MARKET RATE</b>		
2345 units	3308 units	790 units
\$1122 average rent	\$1281 average rent	\$1621 average rent
\$44,880 affordability income <sup>2</sup>	\$51,240 affordability income	\$64,840 affordability income
<b>TAX CREDIT (60% AMI)</b>		
106 units	1251 units	581 units
\$894 average rent	\$1044 average rent	\$1200 average rent
\$35,760 affordability income	\$41,760 affordability income	\$48,000 affordability income
<b>RENTAL AFFORDABLE DWELLING UNITS(30% AMI TO 50% AMI)</b>		
93 units	148 units	46 units
\$777 average rent	\$932 average rent	\$1077 average rent
\$31,080 affordability income	\$37,280 affordability income	\$43,080 affordability income
<b>2,544 Total 1 BR</b>	<b>4,707 Total 2 BR</b>	<b>1,417 Total 3 BR</b>

<sup>1</sup> The information is derived from the "Loudoun County Apartment Rental Guide."

<sup>2</sup> Affordability income is calculated by assuming that the average rent is 30% of monthly income-the HUD standard for rent/mortgage affordability.

Even if exempted by the Zoning Ordinance, the Applicant may still proffer to provide ADU's to the County. Please note, if the Applicant proffers to provide ADU's that would have been otherwise exempted, the provision of such ADU units must be specifically stated in the proffer statement. The County shall waive the application fee for any Concept Development Plan Amendment that provides for ADU units that would have otherwise been exempted. The locations of the ADU units need to be dispersed throughout the market rate units on the property, they cannot be located within one building, and their location needs to be displayed on the record plat.

The Applicant could also consider proffering to provide cash contributions to the County's Housing Fund or land to be used by a non-profit affordable housing developer to build affordable rental housing. The County Housing Fund was established by the Board of Supervisors' on April 3, 2007, to fund a variety of unmet housing needs for incomes from 0% up to 100% AMI. The Board's objective is to have one fund that can be leveraged and that is large enough to fund significant housing proposals, not separate, individual funds that are project specific.

[Proffer IV.A] Please revise the proffer statement to remove "workforce dwelling units" from being exempt from paying capital facilities contributions. There is no County policy or approved capital facility standard for "workforce dwelling units" that would allow the Applicant to be exempt from paying the required capital facility contribution on those units. Staff requests that such a provision be removed from the proffer statement.

[Proffer IV.B] Please revise the proffer statement to state that the Applicant will pay the Route 28 Tax District Buy-out payment as determined by the County's Department of Management and Financial Services. Please remove all references to per residential dwelling unit payments for this buyout, unless specifically directed to do so by the County's Department of Management and Financial Services. Please remove all references of ADU or Workforce Dwelling units from being exempt from this payment.

[Proffer V.A.1.a] Please clarify that the Promenade will include one acre of open space as the required "Town Green" portion of the development (40,000 square feet), and an additional one acre of open or civic space. The cumulative acreage of Town Green and open/civic space will total two acres in the Promenade.

[Proffer V.B] Please clarify how the square footage calculation will be incorporated into the 5% total land area calculation for civic space in the event civic space is provided within a building. Will the 2.74 acres of civic space required in the PD-TC zoning district be converted into square feet (2.74 acres x 43,560 square feet = 119,354 square feet) by which square footage provided within a building for civic uses would be subtracted when calculating total civic space provided as part of this application?

Please note, if a County public use is developed within the required civic space within the PD-TC zoning district (ex. A fire and rescue station), then a capital facility credit would not be granted to the Applicant because the space is required to be developed as civic space under the terms of the Zoning Ordinance, and the Proffer Statement lists certain public uses as allowable civic uses in this application.

**[Proffer VII.A.5]** Please revise the proffer statement to provide that if the adjacent property owner does not provide the IEIA offsite right-of-way to construct Innovation Avenue east to Rock Hill Road, then the Applicant shall request the use of eminent domain by Fairfax County to acquire the offsite right-of-way required to develop the full extension of Innovation Avenue to Rock Hill Road.

**[Proffer VII.I]** Please revise this proffer to state the following:

"All cash equivalent contributions made by the Applicant in the event the funding and construction of proffered road improvements are completed by others (third parties), specifically the cash equivalent contributions provided in Proffers VII.A.6, VII.D.5 and VII.F.3, will be determined from all project construction costs to include engineering, surveying, bonding, permit fees, utility relocation and other hard costs of construction based on actual costs expended as verified by invoices for project expenses by the party who completed such road construction. In the event that the paid invoices for the work cannot be obtained to verify actual costs expended for road construction, the cash equivalent contribution will be based upon County bonding estimates for said construction. The cash equivalent contribution shall be paid to the County at the time the Applicant would have otherwise been required to bond or construct such road improvements and may be used at the County's discretion for regional road and transit improvements in the vicinity of the property."

**[Proffer VIII.E]** Please revise the proffer statement to include that all lighting provided in the development or on the property will be in conformance with Section 5-1504 of the Revised 1993 Zoning Ordinance, Light & Glare Standards.

**[Traffic Signals]** Please note that there are no proffered traffic signals related to this development. Will all traffic related to this application be handled by the Innovation Avenue Interchange at Route 28, existing traffic signals and traffic signs offsite from the property?

If you have any questions concerning this correspondence, please call me at (703) 771-5997.



# TOWN OF HERNDON

Steve J. DeBenedittis, Mayor  
Lisa C. Merkel, Vice Mayor  
Connie Haines Hutchinson  
Sheila A. Olem  
Jasbinder Singh  
William B. Tirrell  
Grace Han Wolf

P.O. BOX 427  
HERNDON, VIRGINIA 20172-0427  
(703) 435-6805  
mayor.steve@herndon-va.gov



Steve DeBenedittis  
Mayor

September 17, 2010

VIA EMAIL & FACSIMILE

Honorable Scott York, Chairman, and  
Members of the Loudoun County Board of Supervisors  
1 Harrison Street SE, Fifth Floor  
PO Box 7000, Maildrop #01  
Leesburg, Virginia 20177-7000

**Re. Town of Herndon Comments –  
Dulles World Center (ZMAP 2008-0018/SPEX 1008-0052)**

Dear Chairman York and Members of the Loudoun County Board of Supervisors:

The Dulles World Center re-submittal of July 30, 2010, has been reviewed by Town staff who reported that the applicant has addressed some comments made earlier by the Town of Herndon. Nonetheless, significant issues remain.

While the Town is pleased to note that the applicant no longer requests modifications as extreme as those requested in the 2009 submittal, and that conditional accommodation is being made for a future bridge across the Dulles Toll Road, the proposed development has changed little in size and impact on its surroundings.

I refer you to prior correspondence from the Town dated February 27, 2009 and July 15, 2009 (attached), and this letter supplements those comments. The Town restricts its comments to development factors that influence the impact on the Town of Herndon of vehicular traffic from the development, and the effects on Herndon of adding almost 3,000 residents within one-half mile of the Town's western boundary.

As you might imagine, it is extremely difficult for the Town to contemplate the Dulles World Center application in isolation from its surroundings. Dulles World Center is part of a cluster of development, including the Center for Innovative Technology (CIT) and Dulles Metro developments, which are proposed in response to the anticipated start of Metrorail service in 2016.

It is recognized by all and demonstrated by the applicant's traffic impact study that the presence of rail will not negate significant increases in vehicle trips. Vehicular access to these developments must be accommodated with less reliance on the small town streets of Herndon. As a town that has achieved build-out and which will experience isolated areas of redevelopment in the future, the Town's options for roadway redesign to address increased capacity are extremely limited.



**Honorable Scott York, Chairman, and  
Members of the Loudoun County Board of Supervisors  
September 17, 2010  
Page Two**

The Town is gratified by the work of the Interjurisdictional Working Committee examining additional routes and travel modes to access the subject properties. The Town urges that decisions about the Dulles World Center rezoning wait until the affected jurisdictions make decisions about increasing transportation access to the properties.

Four of the assumptions on which the applicant's traffic impact study is built are of serious concern in light of the Interjurisdictional Working Committee's discussions and findings to date, namely:

- The widening of Route 606 to six lanes from Shaw Road to east of the Herndon Parkway;
- Widening Rock Hill Road to four lanes by others, even though the improvement is unfunded;
- The addition of turn lanes to be constructed by others at the intersection of Herndon Parkway and Sterling Road, even though the improvement is unfunded; and
- The continuing omission of Davis Drive south of Route 606 in Loudoun County's comprehensive plan and the failure of the applicant to acknowledge future connection.

The Town sees Route 606 at Rock Hill Road as a major gateway to Herndon. Inside the Town limits the roadway has curb, gutter, sidewalks, a groomed median with trees and a landscaped berm screening the Town's public works facility on the south side of Route 606. The road is bounded by established single-family detached neighborhoods.

The Town recognizes that its gateways, along with its heritage downtown, form the core of its visual image for visitors and residents alike. The Town Council takes seriously its 2027 Vision Statement:

*"Herndon is a charming and unique town, characterized by its harmonious blend of the past and present... Thoughtful physical development, including the town's gateways, public open spaces, buildings and public and private infrastructure, provides both pedestrians and motorists with ample opportunity to experience Herndon's history and ambiance."*

The Dulles World Center rezoning assumes and accepts significant degradation of the Route 606 gateway. This application has even placed the Town in a position of contemplating and asking for sound walls along this gateway entrance if this application is approved. Sound walls located along one of our Town's gateways are an anathema, but this may be the only way to protect the existing homes in the vicinity.

Despite Herndon's utmost efforts over the years to advocate a smooth transition from a future six lane section on Route 606 to the existing four lane section at the western Town limits, the Town sees no effort by Loudoun County or by the applicant to support such a transition.

**Honorable Scott York, Chairman, and  
Members of the Loudoun County Board of Supervisors  
September 17, 2010  
Page Three**

The Dulles World Center applicant shows six through lanes on Route 606 at the intersections with Rock Hill Road and with Herndon Parkway to be in place by 2015. This is erroneous and astonishing since such "improvements" are neither planned nor funded. I am sure you can understand how the Town leadership would find such continued presumption by the applicant to be outrageous.

The Town urges Loudoun County to disallow a level of development that would further degrade traffic service at the Town's western gateway, or to require the applicant to find a method to mitigate the traffic impact other than widening Town streets in a way that is clearly inconsistent with Town plans. As has been discussed in the Interjurisdictional Working Committee, additional lanes on Route 606 should begin and end west of Davis Drive.

The stakes for Herndon are very high. As shown by the Dulles World Center Traffic Impact Study, the proposed developments cause gridlock at the intersection of Herndon Parkway and Sterling Road (Route 606) located near the western border of the Town. Please see the attached chart for traffic impact study information pertinent to Herndon. Most approaches to the intersection operate at a level of service F and the most congested movement, left turns from Herndon Parkway onto westbound Route 606, is forced to carry five times the capacity of the turn lane. It should be pointed out that this turn lane is already longer than a standard left turn lane.

The Town engaged its transportation consultant to study the impact on several Town intersections that will carry traffic from the proposed developments. The study found that Sterling Road/Route 606 experiences significant congestion resulting in the failure of associated intersections at Crestview Drive and Sterling Road and at Elden Street and Sterling Road. **The link volumes will fail on the entire length of Sterling Road. Because of the congestion at the intersection of Herndon Parkway and Sterling Road, Herndon Parkway will experience combined queues of almost a mile for the northbound and southbound approaches to the intersection.** The Town is aware of the need to address future traffic conditions within the Town limits and will do so through a thoughtful process of community engagement, technical analysis and long range planning. However, it must be recognized by our jurisdictional neighbors that, due to the physical limitation imposed by existing development and the absolute necessity of protecting and preserving the residential and pedestrian nature of the west end of our community, future roadway improvements must be creative and sensitive.

As we discussed during the interjurisdictional meetings, in future scenarios Rock Hill Road south of Route 606 should be relegated to the status of a minor collector with the future Davis Drive accepting the majority of north/south traffic along the western edge of future development. The applicant, though, proposes to use Rock Hill Road, significant portions of which are an unimproved rural street section. Almost two million square feet of the development is proposed to be built by 2015 (along with an assumption that the CIT and Dulles Metro developments will be on line) and yet the applicant proposes the use of Rock Hill Road in its current condition with no other access improvements except Innovation Drive. By 2015, the

**Honorable Scott York, Chairman, and  
Members of the Loudoun County Board of Supervisors  
September 17, 2010  
Page Four**

rural Rock Hill Road is projected to carry an average of 13,200 trips per day at its intersection with Route 606. With a capacity shown to be 13,850 vehicle trips per day, the road would operate at a level of service E if it were a standard two lane section with shoulders or with curb and gutter, and it is anything but standard. While the applicant's traffic study assumes Rock Hill Road will be improved by others, the draft proffer statement does not delay development until Rock Hill Road is improved.

The applicant proposes to proffer to install a second left-turn lane from westbound Sterling Road onto southbound Rock Hill Road. This improvement would lie within the Town limits and would require additional right-of-way to be purchased either from single-family homeowners or from the Town itself. The Town requests that Loudoun County seek an alternative means to conduct traffic successfully to the development site.

Specifically, the Town seeks the addition of Davis Drive south of Route 606 as the primary north/south route, westward of the existing Rock Hill Road intersection. **I am asking you to require that the applicant provide an addendum to the most recent traffic impact study, showing and modeling a future Davis Drive south of Route 606, providing plausible vehicular connection to the future bridge and redistributing the trips currently anticipated for Rock Hill Road south of Route 606.**

Concerning recreational facilities, the proposed development offers very little for future residents of Loudoun County. As we already know, many eastern Loudoun residents rely on recreational amenities provided by the Town. The current proposal offers only some passive recreational space and apparently minor exercise facilities, standard for multifamily housing products in the region.

The current rezoning offers no benefits to the Town as currently proposed, and would produce a significant decrease in the quality of life for Herndon residents. As explained in my letter of July 15, 2009, the Town asserts that development impact would be more consistent with the existing zoning designation if the scale of the Dulles World Center was more comparable to the Noursi/Kawar/CIT proposal, with 2.8 million square feet at build-out instead of 4.0 million square feet proposed.

In the event the application is approved, the Town seeks support from Loudoun County and the applicant for:


- a. Parks and recreation impacts in the Town of Herndon:
  - i. Development of facilities on-site for organized public recreational activities (additional to the proposed 11 acres of open space) in Loudoun County or provide Loudoun County with money adequate to acquire land and build active recreation facilities within one half mile of the site; and

**Honorable Scott York, Chairman, and  
Members of the Loudoun County Board of Supervisors  
September 17, 2010  
Page Five**

- ii. Contribution to the Town of Herndon community center for increased demand on classes, organized activities and use of athletic fields (\$100 per dwelling unit approved would equate to \$149,500 for the 1,495 dwellings current proposed).
- b. Traffic impacts within the Town of Herndon (items i - iv under "b" below reflect amendments since the letter of July 15, 2009):
  - i. Contribution towards design and implementation of the bridge over the Dulles Toll Road;
  - ii. Seeks a means of funding the design and construction of the Dulles Toll Road bridge;
  - iii. Contribution towards design and implementation of future Davis Drive south of Route 606;
  - iv. During construction of the three phases of the Dulles World Center site, construction vehicles having a registered gross weight in excess of 7,500 pounds and destined for, or leaving from the development site, shall not be routed through the Town of Herndon;
  - v. Contribution toward a sound wall on Sterling Road adjacent to single-family residential units inside the Town boundaries between the existing Rock Hill Road intersection with Sterling Road/Ox Road and the intersection of Herndon Parkway and Sterling Road (\$500,000);
  - vi. Contribution toward construction of an ADA accessible five-foot sidewalk with ADA curb cuts on the north side of Sterling Road between Rock Hill Road and Herndon Parkway (\$100,000);
  - vii. Contribution toward study and improvements associated with the long range redesign of the intersection of Sterling Road and Herndon Parkway (\$300,000); and
  - viii. Contribution toward traffic calming measures inside the Town boundaries to include high-volume heavy duty paver crosswalks on each pedestrian approach across the intersection at Herndon Parkway and Sterling Road (est. \$120,000).

We look forward to continuing cooperation between Fairfax County, Loudoun County and the Town of Herndon as development near the Town proceeds through the review process.

Sincerely,

  
Steve DeBenedittis  
Mayor



**Honorable Scott York, Chairman, and  
Members of the Loudoun County Board of Supervisors  
September 17, 2010  
Page Six**

**Attachments**

- c. **Members of the Herndon Town Council  
Honorable Sharon Bulova and Members of the Fairfax County Board of Supervisors  
Honorable Charles D. Snelling, Chairman, Metropolitan Washington Airports Authority  
Members of the Herndon Planning Commission  
Members of the Loudoun County Planning Commission  
Arthur A. Anselene, Town Manager  
Elizabeth M. Gilleran, Director of Community Development  
Kay D. Robertson, Senior Project Planner  
Jennifer Boysko, Legislative Aide, Fairfax County Dranesville District/Herndon Office**

<b>Table 1. Evaluation of Improvements at Proposed Dulles World Center (DWC) West of Herndon from Traffic Impact Study, Dulles World Center, Concept Plan Tabulation Sheet submitted 7/30/10, and Draft Proffer Statement Prepared for Greenfield Partners, 7/30/10</b> This table prepared by the Herndon Department of Community Development, August 13, 2010			
	Cumulative sum	Transportation improvements	Recreational Amenities <sup>1</sup>
Phase IA (2015)	1,131,400 square feet maximum of nonresidential floor area, including a minimum of 1,024,436 square feet of office floor area 350 hotel rooms (with conditions) with a maximum of 350,000 square feet of hotel floor area allowed during any phase of development	<ul style="list-style-type: none"> <li>• six continuous through lanes on Route 606 from Oak Grove Road to Rock Hill Road (assumed to be constructed by others by 2015; not funded in Six Year Improvement Program)</li> <li>• (in town limits) dedicated right turn on southbound Herndon Parkway to westbound Sterling Road (assumed to be constructed by others by 2015)</li> <li>• (in town limits) second left turn lane on northbound Herndon Parkway to westbound Sterling Road (assumed to be constructed by others by 2015)</li> <li>• Dedicate land for six lane realigned Innovation Avenue and build four lanes from Route 28 to Rock Hill Road</li> <li>• Any time upon request by Loudoun County, reserve and dedicate 83' right-of-way to accommodate a portion of a four lane bridge over the Dulles Toll Road between realigned Innovation Drive and Sunrise Valley Drive.</li> <li>• dedicate land and construct interchange at Route 28 and Innovation Avenue (by DWC)</li> <li>• acquire land and construct second westbound left turn lane from Route 606 onto southbound Rock Hill Road (by DWC)</li> <li>• pre-rail TDM program @ 4% trip reduction (by DWC)</li> </ul>	<ul style="list-style-type: none"> <li>• 11.2 acres of open space with trail network, gazebos, plazas, pocket parks, picnic areas, etc.</li> <li>• \$23,758 for each market-rate multi-family unit paid to Loudoun County as a capital facilities contribution</li> <li>• interior recreational amenities for residential buildings</li> </ul>
Phase IB (2015)	Additional 383,964 square feet of office uses for a cumulative total of 1,408,400 square feet of office uses	<ul style="list-style-type: none"> <li>• Metrorail service available<sup>2</sup></li> <li>• provide right-of-way and construct one half of a two lane road parallel to and one block south of Innovation Avenue and along the north property line of the CIT property</li> <li>• post-rail TDM program to achieve 10% trip reduction</li> </ul>	
Phase II (2020)	Additional 1,165,123 sf nonresidential including 1,034,600 sf office for a cumulative total of 2,680,487 nonresidential uses including 2,443,000 office uses 973 dwellings		
Phase III (2030)	4,029,500 max nonresidential 1,495 dwellings Any floor area not already built in earlier phases	<ul style="list-style-type: none"> <li>• connection of Davis Drive (by others) between its current terminus and Route 606</li> <li>• various intersection and signal improvements</li> <li>• acquire land and construct two-lane Shaw Road from Innovation Ave to existing Shaw Road (approximately 2,000 feet)</li> <li>• construct six lane section along portion of Innovation Ave., from Route 28 interchange to approx. 1500' east</li> </ul>	

<sup>1</sup> Based on draft proffer statement

<sup>2</sup> draft proffer statement #III.A. 3 specifies "prior to the commencement of Phase II, the Metropolitan Washington Airports Authority shall have extended Metrorail service to the Route 28/CIT Metro Station."

Table 2. Comparison of Level of Service in at Intersections in Herndon: Impact of Proposed Dulles World Center West of Herndon from Traffic Impact Study, Dulles World Center Prepared for Greenfield Partners, August 5, 2010						
	2008	2020, without Dulles World Center	2020, with Dulles World Center	2030, without Dulles World Center	2030, with Dulles World Center, without DTR bridge <sup>1</sup>	AM Peak Hour LOS / delay (seconds/vehicle) PM Peak Hour LOS / delay (seconds/vehicle) 2030, with Dulles World Center, with bridge over DTR
Amount of development at Dulles World Center	0		2,443,000 sf office 973 du 273 hotel rooms 237,487 sf retail		3,229,500 sf office 1495 du 273 hotel rooms 400,050 sf retail	3,279,500 sf office 1495 du 273 hotel rooms 350,000 sf retail
Trips due to development	0	0	31,652 (3,378 am peak, 3,871 pm peak)	0	45,991 (4,521 am peak, 5,229 pm peak)	42,768 (4,517 am peak, 5,226 pm peak)
Sterling Road at Herndon Parkway – overall intersection	E/69.6 F/141.2	D/54.3 E/68.5	D/54.4 F/90.0	F/133.4 F/145.8	F/207.2 F/340.0 F/239.0 F/255.6 (with signal adjustment and, turn lane impr.)	F/327.5 F/436.1
Sterling Road at Herndon Parkway – northbound approach only	F/106.0 F/181	D/43.7 D/50.5	D/55.1 F/194.4	D/54.3 F/143.0	F/* <sup>2</sup> F/* (with turn lane improvements)	F* <sup>3</sup> F* F/227.4 F/216.5 (with signal adjustments)
Sterling Road (Old Ox Road) at Rock Hill	E/67.4 C/22.6	C/25.3 C/23.0	E/59.2 D/53.2	F/93.3 E/88.7	F/137.3 F/172.7	F/242.7 F/256.6

<sup>1</sup> Assumes build-out of CIT and Stout (Dulles Metro) development by 2015.

<sup>2</sup> The symbol (\*) in the Traffic Impact Study means "geometric constraints at this intersection restrict additional roadway improvements."

<sup>3</sup> The Traffic Impact Study of February 19, 2010 indicated a delay of 12 minutes in the AM peak (LOS F/715.4) and a delay of 15 minutes in the PM Peak (LOS F/900.5)

**Table 2. Comparison of Level of Service in at Intersections in Herndon:  
Impact of Proposed Dulles World Center West of Herndon  
from Traffic Impact Study, Dulles World Center  
Prepared for Greenfield Partners, August 5, 2010**

						AM Peak Hour LOS / delay (seconds/vehicle)	PM Peak Hour LOS / delay (seconds/vehicle)
	2008	2020, without Dulles World Center	2020, with Dulles World Center	2030, without Dulles World Center	2030, with Dulles World Center, without DTR bridge <sup>1</sup>	2030, with Dulles World Center, with bridge over DTR	
Road – overall intersection			D/50.6 C/33.6 (with signal adjustment and extra turn lane)	E/80.7 E/71.0 (with signal adjustment)	(with turn lane improvement)	F/235.4 F/236.5 (with signal adjustment and turn lane improvement)	
Sterling Road (Old Ox Road) at Rock Hill Road – westbound approach	A/8.3 B/13.3	B/15.0 B/18.5	E/72.6 E/57.1	D/41.8 D/37.8	E/77.9 F/117.7 (with turn lane improvement)	F/176.3 F/140.3	
						F/151.3 F/86.9 (with signal adjustment and turn lane improvement)	



# TOWN OF HERNDON

*Enriching the Quality of Life and Promoting a Sense of Community*



## MEMORANDUM

**To:** Stephen Gardner, Project Manager  
Loudoun County Department of Planning

**From:** Elizabeth M. Gilleran, Director of Community Development *EmG*

**Date:** February 27, 2009

**Subject:** ZMAP 2008-0018 & SPEX 2008-0052, Dulles World Center

Thank you for sharing information about ZMAP 2008-0018 and SPEX 2008-0052, Dulles World Center, and requesting comments from the town of Herndon as a reviewing agency. On January 26, 2009, the Mayor, Stephen J. DeBenedittis, sent correspondence to Supervisor Stevens Miller with comments including a resolution adopted by the Town Council about multiple development proposals in northeast quadrant of the intersection of Route 28 and the Dulles Toll Road. The following staff comments supplement the town council's comments, which are provided as an attachment.

1. Innovation Avenue. At a meeting of the Fairfax County Dranesville District Area Plan Review Task Force on February 19, 2009, representatives of the Center for Innovative Technology (CIT) made clear that Innovation Avenue is not a public road and literally is owned by the CIT, which is proposing massive development of its own. As a condition of approval of ZMAP 2008-0018, Innovation Avenue should be dedicated for use as a public street, or a binding agreement set up in perpetuity to ensure that public use of Innovation Drive cannot be restricted or terminated by CIT.
2. Public Facilities and Amenities. The town staff supports a planning practice of establishing mixed uses in planned developments. The materials provided for ZMAP 2008-0018 do not explain how public facility needs for schools, emergency services, recreation and cultural events will be met both for residents and for workers in the future development. Does the applicant assume that facilities and services, already functioning above capacity, within the town of Herndon and in the Sterling area will be available to the future residents and workers? Clarification about Loudoun County's policy for public facilities and services in the area of the proposed rezoning would be appreciated.
3. Applicant's Statement of Justification.
  - a. On the one hand, the applicant asserts that the proposed development will be compact, pedestrian-friendly and vertical. On the other hand, the applicant asserts

the need for an iconic presence of each office building arranged in a linear pattern along the Dulles Toll Road. These objectives do not seem harmonious.

- b. The applicant requests a zoning modification to allow a ten foot setback, while alluding elsewhere to a pedestrian-friendly environment. The town's experience is that a sidewalk of ten feet in width is not adequate to create a pedestrian-friendly environment. Space is needed for utilities (fire hydrants, street lights, safety signage, directional signage), landscaping, benches, bicycle racks, litter and recycling containers. The town has a standard streetscape width of 12 feet in its downtown, and it allows for a four-foot clear pathway for pedestrians. Our experience has shown that 12 feet is barely adequate and that a truly effective pedestrian environment requires a streetscape of 14 feet or more in width.
  - c. While the applicant makes repeated references to the planned Metrorail station to justify the increased density and the zoning modifications, the applicant offers no features or services to support the Metrorail station. As a condition of approval, the applicant should provide support amenities such as: shuttle bus service to the Metrorail station, a Metrorail kiosk to purchase parking and rail passes, parking spaces that can be used by Metrorail riders, and coherent pedestrian links or people-mover system to access the Metrorail station. Assistance for persons with disabilities or seniors should be provided to make the Metrorail station more accessible for the proposed development, much of which lies more than one half mile from the station platform and from the pedestrian bridge landing in Fairfax County.
4. Traffic Impact. The town has not received or reviewed any information about the traffic impact of the proposed development and assumes that the traffic impact will be significant. Even more traffic impact will result from additional and separate development proposed in the CIT vicinity. The town requests a comprehensive study of the amount of traffic that can be handled in the area bounded by Route 28, Route 606, the western town boundary, and the Dulles Toll Road, since that area can accommodate massive commercial development. Is all of that area to rely on Innovation Avenue for access to Route 28? How will Rock Hill Road be used? The town requests that Loudoun County consider:
- a. Realigning Rock Hill Road to intersect Route 606 at Oak Hill Road at either Oak Grove Road or Douglas Court;
  - b. Extending a branch of Rock Hill Road north of the proposed development to loop back to the interchange of Innovation Avenue at Route 28;
  - c. Extending Shaw Road to Innovation Avenue.

**Attachments:**

~~Correspondence of January 26, 2009 from Herndon Mayor Stephen J. DeBenedittis to Supervisor Stevens Miller with a Town Council resolution about multiple development proposals in the CIT vicinity~~

Cc: Art Anselene, Town Manager  
Bob Boxer, Director of Public Works  
Dana Heiberg, Senior Planner  
Mark Duceman, Transportation Planner  
Kay Robertson, Senior Project Planner

# TOWN OF HERNDON

Steve J. DeBenedictis, Mayor  
Connie Hutchinson, Vice Mayor  
Richard F. Downer  
Dennis D. Husch  
David A. Kirby  
William B. Tirrell, Sr.  
Charles D. Weddell

P.O. BOX 427  
HERNDON, VIRGINIA 20172-0427  
(703) 435-6805  
mayor:steve@herndon-va.gov



Steve DeBenedictis  
Mayor

January 26, 2009

Honorable Stevens Miller, Dulles District  
Loudoun County Board of Supervisors  
1 Harrison Street, S.E., Fifth Floor  
P.O. Box 7000, Mailstop #01  
Leesburg, Virginia 20177-7000

## Re. Town of Herndon Resolution on Inter-Jurisdictional Planning Initiative

Dear Supervisor *Stevens* Miller:

Enclosed is a resolution adopted by the Herndon Town Council on January 13, 2009 strongly advocating an inter-jurisdictional planning effort regarding future development in the vicinity of the Route 28 Metrorail Station. Toward this end, the Town is requesting that Loudoun County, Fairfax County and the Town form a planning task force comprised of elected and appointed officials as well as staff from the affected jurisdictions and agencies.

The Town of Herndon will experience significant impacts from the Dulles World Center zoning map amendment along with other major projects in the vicinity of the Center for Innovative Technology that are seeking Fairfax County comprehensive plan amendments as part of the 2008-2009 North County Area Plan Review process. The Town Council recognizes that successful mixed use development with adequate transportation infrastructure and functional, attractive, transit-oriented design is dependent upon a cooperative effort among elected officials and staff from the affected jurisdictions. In addition to the request for a cooperative planning effort, the enclosed resolution cites several specific concerns that arose from the Town Council's initial discussion on this topic at a work session on January 6, 2009.

It is apparent that development of this scale, at the border of three separate jurisdictions, and adjacent to the future Metrorail station, requires a degree of cooperative planning between Loudoun County, Fairfax County and the Town of Herndon that has never been achieved in the past. Furthermore, it is equally apparent that the Metropolitan Washington Airports Authority, the Virginia Department of Transportation and Metrorail should also be engaged in any such planning effort. Agencies such as the Northern Virginia Regional Commission or the Northern Virginia Transportation Authority with its well-established Jurisdiction and Agency Coordinating Committee might also be enlisted.



**Honorable Stevens Miller**  
**January 26, 2009**  
**Page Two**

We wish to thank the Loudoun County staff for providing the Town with the Dulles World Center rezoning submittals. Town staff participated in a meeting on January 15, 2009 facilitated by the Fairfax County staff, with participation from the Loudoun County staff. This provided an excellent opportunity to learn more about the various large scale mixed use proposals in both Loudoun and Fairfax counties, and it provided the chance for staff from the three affected jurisdictions and the Metropolitan Washington Airports Authority to discuss a wide range of concerns.

We are excited to hear that design for Phase 2 of Metrorail to Dulles will proceed soon, now that there is a Full Funding Grant Agreement for construction of Phase 1. We understand that major infrastructure issues, including any shifts in the location of the Route 28 Metrorail station and its associated facilities both north and south of the Dulles Toll Road, must be finalized within a matter of weeks or months. The Town is encouraged to hear that critical studies on traffic modeling and transportation infrastructure are getting under way. The Town asserts that the inclusion of alternate vehicle connections into and out of the development area is of tremendous importance. We understand that Fairfax County staff is developing a white paper on the bridge over the Dulles Toll Road that is shown on the Fairfax County Comprehensive Plan. While we do not anticipate that this street connection will handle a significant amount of regional traffic, we view it as a supplemental link that may be a valuable part of an overall solution.

The Town looks forward to working cooperatively with Fairfax and Loudoun counties as our planning staffs and our elected and appointed officials shape the future of this extremely important gateway to Dulles Airport and the surrounding jurisdictions.

Sincerely,



**Steve DeBenedittis**  
**Mayor**

---

**Enclosure**

- c. Members of the Herndon Town Council  
Honorable John Foust, Fairfax County Board of Supervisors, Dranesville District  
Honorable Scott K. York, Chairman, Loudoun County Board of Supervisors  
Arthur A. Anselene, Town Manager



**TOWN OF HERNDON, VIRGINIA**

**RESOLUTION**

**JANUARY 13, 2009**

**Resolution – Town of Herndon Review of the Dulles World Center, Loudoun County ZMAP 2008-0018 and SPEX 2008-0052 with Consideration of Adjacent Development Proposals Including Comprehensive Plan Amendments in Fairfax County Nominated by the Center for Innovative Technology and Dulles Metro LLC as part of the 2008-2009 North County Area Plan Review.**

**WHEREAS,** the Town Council recognizes the following:

1. There is great potential for high quality transit oriented development at a regional scale in the areas located northeast of Dulles Airport and to the south and west of the Town of Herndon boundaries. The area of concern includes the vicinity of the Dulles Toll Road, Route 28, Route 606, the Center for Innovative Technology, the Route 28 Metrorail Station and the Fairfax County, Loudoun County and Town of Herndon shared boundaries.
2. Within these unincorporated areas, there is a need to coordinate development plans between specific sites, with current and future development plans north and south of the sites and with all affected jurisdictions.
3. Within these areas there is a need for effective coordination and regional planning for public facilities and services, including but not limited to, fire and rescue services, transportation facilities, and parks and recreation facilities.

**BE IT RESOLVED** by the Town Council for the Town of Herndon, Virginia, that:

1. The Town Council requests that a committee of elected officials and staff from the affected jurisdictions be formed to address planning issues associated with regional scale development in the areas of concern; participants might include supervisors from the Dulles and Dranesville districts in Loudoun and Fairfax counties, the Mayor of the Town of Herndon and the Northern Virginia Regional Commission.
2. The Town Council urges Fairfax County and Loudoun County to continue to share information on development proposals in these important areas of concern and to work cooperatively to integrate major new developments with existing development in surrounding areas, regardless of the jurisdictional boundaries.
3. Based on a brief preliminary review, the Town Council communicates and shares the following concerns with all interested parties:

- a. Active recreation facilities do not appear to be provided within any of the proposed developments, a condition that would create impacts on Town of Herndon facilities and other facilities in the wider area.
- b. A clear plan is needed to enhance street, transit and pedestrian connectivity to the Route 28 Metrorail Station in general, and specifically to enhance that connectivity to the Town of Herndon and to the Parcher Avenue area in Fairfax County.
- c. In the area of concern, there is a lack of secondary transportation facilities to connect to primary facilities such as the Dulles Toll Road, Route 28, Route 606 and Metrorail. Preliminary development proposals offer limited connection to the regional road network via the future Route 28/Innovation Avenue interchange, Innovation Avenue and Rock Hill Road. Therefore, consideration should be given to developing additional direct (on ramp and/or off ramp) access to the Dulles Toll Road.
- d. The Fairfax County Comprehensive Plan as well as the Metrorail development plans for the Route 28 Station include area designated for a bridge over the Dulles Toll Road/Dulles Airport Access Road connecting Dulles Greene Drive and Innovation Avenue on the north side of the toll road to the Dulles Station development south of the toll road; however, there is no public sector project funded to design and construct this bridge, nor is the bridge shown on current development proposals or plan amendment nominations.
- e. The future form and alignment of Rock Hill Road as it exists south of Sterling Road/Route 606 needs evaluation; while the Loudoun County transportation plan calls for a 4-lane undivided street, additional widening and re-alignment west of the residences located nearby to the east may be needed and an evaluation of the adequacy of an at-grade intersection for Rock Hill Road and Sterling Road/Route 606 is also needed.
- f. Further evaluation of facilities to serve future development is needed, to include Route 606/Sterling Road, Shaw Road, Davis Drive and other potential transportation facilities including the form of intersections and/or interchanges. A circulator loop that would eventually serve multiple properties between the Town of Herndon and Route 28 could be created.

4. This resolution shall be effective on and after the date of adoption.

This is certified to be a true and accurate copy of Resolution 09-G-06 adopted at a legally convened meeting of the Town Council of the Town of Herndon on January 13, 2009.

  
Amanda E. Morrow, Legislative Assistant

# TOWN OF HERNDON

Steve J. DeBenedittis, Mayor  
Connie Hutchinson, Vice Mayor  
Richard F. Downer  
Dennis D. Husch  
David A. Kirby  
William B. Tirrell, Sr.  
Charlie D. Waddell

P.O. BOX 427  
HERNDON, VIRGINIA 20172-0427  
(703) 435-6805  
mayor.steve@herndon-va.gov



Steve DeBenedittis  
Mayor

July 15, 2009

**HAND DELIVERED**

Honorable Scott York, Chairman, and  
Members of the Loudoun County Board of Supervisors  
1 Harrison Street SE, Fifth Floor  
PO Box 7000, Maildrop #01  
Leesburg, Virginia 20177-7000

Re. Town of Herndon Comments – Dulles World Center (ZMAP 2008-0018/SPEX 1008-0052)

Dear Chairman York and Members of the Loudoun County Board of Supervisors:

On behalf of the Town Council, I appreciate this opportunity to submit comments about rezoning application for the proposed Dulles World Center. Our two jurisdictions have formed a beneficial working relationship in the review of this application and your attention to the Town's concerns has been especially appreciated.

On January 26, I sent a letter attaching a resolution adopted unanimously by the Town Council. The amount of cooperative review that has occurred between us and our respective staff has been significant and has begun to address some of the items contained in the resolution. There remain some concerns that have not been addressed adequately, and they include:

- Outdoor active recreation facilities do not appear to be provided within the proposed development, a condition that would create impacts on Town of Herndon facilities and other facilities in the wider area. In fact, the applicant seeks a modification to reduce the amount of civic land that would otherwise be required by the Loudoun County zoning ordinance; and
- A clear plan is needed to enhance transit and pedestrian connectivity to the Route 28 Metrorail Station in general, and specifically to enhance that connectivity to the Town of Herndon and to the Parcher Avenue area in Fairfax County.

The applicant's resubmittal of May 1, 2009 has been reviewed by the Town staff and Herndon has the following additional comments.

The Dulles World Center application seeks a rezoning from Planned Development Research and Development Park (PD RDP) to Planned Development Town Center (PD TC). In addition to the rezoning, the applicant seeks extreme modifications to the PD TC zoning regulations to permit the proposed development. The Town does not object in principle to a rezoning to a Planned Development Town Center district, as requested by the Dulles World Center application. However, the Town objects strenuously to the scope of the modifications and asserts that the requested modifications overwhelm the vision, the intent and the regulatory restrictions for PD TC districts. For example, the modifications would:

- a. Expand the maximum size of the district by more than one third;
- b. Expand the dimensions of the core of the district by one half;
- c. Expand the maximum size of blocks within the district by almost half;
- d. Alter the required mix of uses for office/retail/residential, with a reduction in residential uses from a required minimum of 25 percent to 16 percent;
- e. Reduce the percentage of land area for required civic uses from 10 percent to 5 percent;
- f. Reduce required parking by 24 percent; and
- g. Amend other required features related to design and pedestrian-friendliness.

With these modifications, there seem to be few public benefits from the development as proposed in the application when compared to development under the current zoning or under a Town Center district without modifications. The Town further asserts that the resulting traffic impact makes the modifications unacceptable.

The amount of trips generated by the Dulles World Center development are enormous compared to existing trip generation by all uses within the Town. For example, 2007 Town traffic counts show an average of 38,000 vehicle trips per day at the western Town boundary on Route 606. The Dulles World Center alone is projected to generate 36,000 vehicle trips per day in 2020 and 55,000 vehicle trips per day in 2030, or up to 145 percent of the number of trips entering and exiting the Town on Route 606 in 2007. These traffic numbers are overwhelming considering that the Dulles World Center comprises less than half of the total land area bounded by Route 28, Route 606, the Town boundary and the Dulles Toll Road. While the Town is not opposed to development outside its boundaries, the Town is at a loss to manage the traffic impact resulting from such massive growth at its western doorway.

Traffic impact from the proposed development is significant within the Town, especially on Sterling Road and at the intersection of Sterling Road and Herndon Parkway. The applicant's traffic impact study suggests a need for additional lanes on Sterling Road within the Town limits between Rockhill Road and Herndon Parkway and a need for improvements at the intersection of Herndon Parkway and Sterling Road. Many intersections (including Sterling Road and Herndon



Parkway) affected by the proposed development would operate at a failing level of service, with or without a future bridge over the Dulles Toll Road. The applicant's traffic impact study shows the possibility of a thirteen minute delay (781.5 seconds) on the Herndon Parkway northbound approach at the intersection with Sterling Road.

As shown in Table 1, the intersection at Herndon Parkway will experience double the delay of existing conditions with the proposed development in 2030.

**Table 1. Comparison of Level of Service at Intersections in Herndon:  
 Impact of Proposed Dulles World Center West of Herndon  
 from Traffic Impact Study, Dulles World Center  
 Prepared for Greenfield Partners, April 27, 2009**

AM Peak Hour LOS / delay (seconds/vehicle)  
 PM Peak Hour LOS / delay (seconds/vehicle)

	2008	2020	2030, without bridge over DTR	2030, with bridge over DTR
Amount of development at Dulles World Center	0	1,950,000 sf 1,480 du 300 hotel rooms	3,710,900 sf 1495 du 708 hotel rooms	3,710,900 sf 1495 du 708 hotel rooms
Sterling Road at Herndon Parkway – overall intersection	E/71.3 F/109.5	D/53.8 E/57.8	F/211.1 F/244.9	F/184.0 F/242.2
Sterling Road at Herndon Parkway – northbound approach only	F/116.0 F/145	D/50.8 F/83.1	F/781.5 F/546.8	F/628.4 F/538.0
Sterling Road (Old Ox Road) at Rockhill Road – overall intersection	E/67.5 C/22.6	D/49.2 E/56.5	F/141.8 F/226.4	F/453.4 F/287.9
		D/46.9 C/34.1 (with signal adjustment)		F/* F/367.1 (with signal adjustment)
Sterling Road (Old Ox Road) at Rockhill Road – westbound approach	A/8.6 B/13.3	D/47.7 E/64.2		F/101.6 F/123.6
		D/47.7 C/29.3 (with signal adjustment)		F/86.9 F/144.9 (with signal adjustment)

\* Geometric constraints at this intersection restrict additional roadway improvements

The Town notes that the extreme delays in 2030 accompany certain intersection improvements that have not been discussed with the Town or endorsed by the Town. The applicant assumes certain street and intersections improvements in 2015 within the Town in order to show acceptable levels of service for the development in 2015 but that nevertheless fail in 2030. The Town does not concur with the improvements assumed and takes exception to the inclusion of them in the traffic impact study. Improvements shown by the applicant, but not endorsed by the Town, include six lanes of traffic on Sterling Road between the western Town limit and Herndon Parkway and expansion of the intersection at Sterling Road and Herndon Parkway to accommodate additional lanes. The intersection is constrained and such improvements would require the acquisition of land from single family home owners. The Town is not in favor of this approach to assisting the proposed development's traffic impact. An update to the traffic impact study should reflect projected levels of service in 2020 and 2030 based on existing intersection conditions without making assumptions contrary to the Town's existing policies. In addition, the update to the traffic impact study should reconsider existing levels of service at the intersection of Sterling Road and Herndon Parkway. Existing levels of service are failing on certain approaches to the intersection and that information is not portrayed in Table 1.

The applicant proposes to proffer to install a second left-turn lane from westbound Sterling Road onto southbound Rockhill Road. This improvement would lie within the Town limits and would require additional right-of-way to be purchased either from single family home owners or from the Town itself. As noted elsewhere in this letter, the Town requests the relocation of Rockhill Road intersection with Route 606 and proposes that the dual left turn be provided at the relocated intersection.

Town comments dated February 24, 2009 suggested a need for features and services to support the Metrorail station. The applicant now proffers the provision of two bus stop shelters and shuttle service to the Metro station or transfer station to service Metro. The Town continues to advocate more amenities such as: a Metrorail kiosk to purchase parking and rail passes, parking spaces that can be used by Metrorail riders, and coherent pedestrian links or people-mover system to access the Metrorail station. Assistance for persons with disabilities or seniors should be provided to make the Metrorail station more accessible for the proposed development, much of which lies more than one half mile from the station platform and from the pedestrian bridge landing in Fairfax County.

The Dulles World Center site is a portion of a rezoning to Planned Development Research and Development Park that occurred 20 years ago, referred to as "Noursi/Kawar/CIT" and comprised 92 acres (see Table 2). That rezoning increased the allowed density on the site up to a maximum of 1.0 Floor Area Ratio. It received approval for a building height of up to 100 feet. At build out, the Dulles World Center site generates 42 percent more trips in the morning peak hour and 33 percent more trips in the evening peak hour than the Noursi/Kawar/CIT proposal. The Town asserts that development impact would be more consistent with the existing zoning designation if (a) the scale of the Dulles World Center was more comparable to the Noursi/Kawar/CIT proposal, with 2.8 million square feet at build out instead of 3.7 million square proposed, and (b) modifications were not sought with the Dulles World Center application.

**Table 2. Comparison of Previously Approved Development  
 and Currently Proposed Development Impact of Proposed Dulles World Center  
 West of Herndon from Traffic Impact Study, Dulles World Center  
 Prepared for Greenfield Partners, April 27, 2009**

		Acres	Proposed Floor Area	Dwelling Units	AM Peak	PM Peak	Comments
Approved in 1989	Noursi/Kawar/CIT only as PD RDP (excludes development of the CIT)	92 *a	2.9 mill *a	0	3,457*b	3,169*b	<ul style="list-style-type: none"> <li>• metro rail not assumed</li> <li>• build out horizon was 2010</li> <li>• does not appear to include any trip reductions</li> </ul>
Proposed in 2009	Dulles World Center only, as PD TC, Interim Phase at 2020 *b	82	2.5 mill	1,480	2,974	3,861	<ul style="list-style-type: none"> <li>• metro rail not assumed</li> <li>• assumes TDM and trip reductions</li> </ul>
Proposed in 2009	Dulles World Center only, as PD TC, at 2030 build out *b	82	3.8 mill	1,495	4,895	4,209	<ul style="list-style-type: none"> <li>• planned bridge over DTR</li> <li>• Davis to Innovation assumed for 2030</li> <li>• assumes TDM and trip reductions</li> </ul>

\*a Loudoun County memorandum of February 7, 1989 regarding ZMAP85-09-KJS  
 \*b Traffic Impact Study, Dulles World Center, Prepared for Greenfield Partners, April 27, 2009

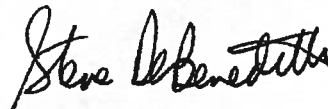
In the event the application is approved, the Town seeks support from the applicant for mitigation of:

- a. Parks and recreation impact in the Town of Herndon:
  - i. Development of active public recreation facilities on site (additional to the proposed 11 acres within the floodplain and 2.7 acres of open space in the central park in the Town center core) in Loudoun County or provide Loudoun County with money adequate to acquire land and build active recreation facilities within one half mile of the site.
  - ii. Contribution to the Town of Herndon Community Center for increased demand on classes, organized activities and use of athletic fields (\$100 per dwelling unit approved; would equate to \$149,500 for the 1,495 dwellings current proposed).

- b. Traffic impact within the Town of Herndon for the following improvements:
- i. Contribution toward a sound wall on Sterling Road adjacent to single family residential units inside the Town boundaries between the existing Rockhill Road intersection with Sterling Road/Ox Road and the intersection of Herndon Parkway and Sterling Road (\$500,000);
  - ii. Contribution toward construction of a sidewalk on the north side of Sterling Road between Rockhill Road and Herndon Parkway (\$100,000);
  - iii. Contribution toward study and improvements associated with the long range redesign of the intersection of Sterling Road and Herndon Parkway (\$200,000); and
  - iv. Contribution toward traffic calming measures inside the Town boundaries to include high-volume heavy duty paver crosswalks on each pedestrian approach across the intersection at Herndon Parkway and Sterling Road (est. \$120,000).

The Town looks forward to continuing cooperation between Fairfax County, Loudoun County and the Town as development near the Town proceeds through the review process.

Sincerely,



Steve DeBenedittis  
Mayor

- c. Members of the Herndon Town Council  
Members of the Herndon Planning Commission  
Honorable Sharon Bulova, Chair, Fairfax County Board of Supervisors  
Honorable John Foust, Dranesville District, Fairfax County Board of Supervisors  
Honorable Catherine M. Hudgins, Hunter Mill District, Fairfax County Board of Supervisors  
Honorable Peggy Maio, Chair, and Members of the Loudoun Planning Commission  
Arthur A. Anselene, Town Manager  
Jennifer Boysko, Legislative Aide, Dranesville District/Herndon Office



**This page is intentionally left blank.**



# County of Fairfax, Virginia

To protect and enrich the quality of life for the people, neighborhoods and diverse communities of Fairfax County

September 10, 2010

Stephen Gardner, Project Manager  
Loudoun County Department of Planning  
1 Harrison Street, S.E., 3rd Floor  
Loudoun County, VA 20175

**Re: ZMAP 2008-0018 and SPEX 2010-0003  
Dulles World Center Amended Application Referral Request**

Dear Mr. Gardner,

The Fairfax County Department of Transportation (FCDOT) appreciates the opportunity to provide comments on the Dulles World Center (DWC) amended rezoning application submittal. The application provides an opportunity for Loudoun County and Fairfax County to coordinate well integrated mixed-use multi-modal focused development near the planned Route 28 Metrorail station. FCDOT has reviewed the revised material for the Dulles World Center rezoning application dated July 30, 2010 along with the associated traffic study and summarized the main points below. These comments supplement the comments sent to you by the Fairfax County Department of Planning and Zoning. Additional detailed comments may be found in the attachment to this letter. The comments are as follows:

Fairfax County recently amended the County's Comprehensive Plan in response to three nominations (09-III-7UP, 11UP, and 12UP) submitted as part of the 2008 North County APR cycle. The subject area of the nominations surrounds the planned Route 28 Metrorail station and extends west to the Loudoun County boundary. In the new plan text there is guidance that more connections are needed to the west, which has been accommodated by the DWC application, and a new connection is needed to the north. Specifically, there is a recommendation to improve Rock Hill Road, maintaining the current two-lane section, and provide a new four lane connection to the west of existing Rock Hill Road. The Fairfax County Comprehensive Plan acknowledges that this new connection would be located in Loudoun County and that coordination between the counties is needed for the road to be constructed. The Draft Proffer Statement contains a commitment by the applicant to construct a second left turn lane on westbound Old Ox Road to southbound Rock Hill Road in the first phase of development, which is 2015. This recommendation would require Rock Hill Road to be widened to at least two-lanes southbound, which is contrary to the newly adopted Comprehensive Plan guidance. Therefore, adding the second left turn lane on Old Ox Road at the Rock Hill Road intersection is not a desirable solution. A more desirable option to alleviate congestion at the Rock Hill Road and Old Ox Road intersection could be for the applicant to

**ATTACHMENT 1p**

Fairfax County Department of Transportation  
4050 Legato Road, Suite 400  
Fairfax, VA 22033-2895  
Phone: (703) 877-5600 TTY: 711  
Fax: (703) 877-5723  
[www.fairfaxcounty.gov/fcdot](http://www.fairfaxcounty.gov/fcdot)



**A-269**

connect Shaw Road to realigned Innovation Avenue in the first phase of development. This would provide two entry points to the DWC site from Old Ox Road and lessen the impact of traffic on the Rock Hill Road and Old Ox Road intersection. Additionally, there is more potential available right-of-way to construct a second left turn lane at Shaw Road and Old Ox Road should this improvement be needed prior to phase three of the development. It should be understood that the Shaw Road connection is not intended to replace a new four lane road that should be constructed to the west of Rock Hill Road.

The concept development plan shows a grid of streets within the site and three connections (Innovation Avenue, Road A, and Road B) to Fairfax County. Additional connections that will foster development in both counties are advantageous; however, the Draft Proffer Statement currently states that all roads on the site will be privately maintained with the exception of Innovation Avenue, which will be public. While the PD-TC district in Loudoun County permits private streets, a concern with Road A and Road B being private is they are intended to be multi-modal connections (including vehicular) between developments in Loudoun County and Fairfax County. Classifying these streets as "private streets" could create access easement issues between the developments, which is of paramount importance to the entire area. It would be preferable that these streets be reclassified as public streets in the final Proffer Statement to avoid conflicts in the future. If this cannot be accomplished then perpetual public access easements should accompany privately maintained Road A and Road B. Whether public or private, these streets should be built to public street standards.

The Route 28 station development in Fairfax County has been classified as transit-oriented development (TOD) due to the proximity of the parcels next to the station. The new and redesigned streets in the TOD are going to be context sensitive and designed in such a way to foster multimodal transportation options. There is a lack of detail in the applicant's submission regarding the cross sections for the planned grid streets as well as the number of lanes for each road segment. Such information is important to establish a standard to assure a walkable environment will be created. Additionally, the traffic study indicates that development will occur in land bays furthest from the station first. The phasing of the grid of streets including connections to the planned Route 28 Metrorail station should be considered and perhaps constructed in the earlier phases when the developments are being implemented and constructed to ensure adequate access in and through the site.

There is more detail in the attachment related to the phasing of road improvements identified in the Draft Proffer Statement and the traffic study. The study identified one improvement that was needed due traffic generated from the site. It is a signal at Rock Hill Road and Biltmore Drive in Fairfax County. This particular improvement is identified as being needed in the study but was not included as an improvement that will be funded and constructed by the applicant in the Draft Proffer Statement. Fairfax County has no plans to construct this improvement that is

needed due to development from DWC. Therefore, this improvement should be added in the final Proffer Statement so that funds may be secured for its construction.

A result of the recent inter-jurisdictional effort between Loudoun County, Fairfax County, and the Town of Herndon was an agreement to realign the bridge crossing the Dulles Toll Road in the vicinity of the Route 28 Metrorail station. The inter-jurisdictional effort recognized that this was an opportunity for all parties involved to agree on an alignment. One such alignment has been integrated into the applicant's concept development plan. There are still outstanding issues regarding the bridge that need to be evaluated such as the impact of the bridge with the Route 28 Station South Study, identifying funding, and assumptions about the design and function of the bridge.

The concept development plan shows the trails and sidewalks that will be utilized by bicyclists and pedestrians. A multiuse trail that will accommodate pedestrian and bicyclists is shown on one side of Road A and one side of Innovation Avenue. Without knowing the cross section and design speed intended for Road A it may be best to have on road bike lanes on both sides of the road or at least a complementary multiuse trail on both sides of Road A. This will allow bicyclists who park at the buildings or garages (especially in land bays 10-13) to use a designated bike lane or trail on the side of the road that will have development on it as well as integrate more transportation options into the site's "town center". Additionally, Road B which connects Road A in Loudoun County to Rock Hill Road in Fairfax County may also need multiuse trails on both sides of the road, which runs next to the planned civic and open spaces in Land Bay 7. This would also create a multiuse trail system on both sides of land bays 1-5, which will contain all of the residential uses on the site. It is the understanding of Fairfax County staff that the applicant intends to market Land Bay A as secure office space; however, this land bay should, to fullest extent possible, try to integrate some network of bike lanes or multiuse trails to make it more desirable for employees to utilize multiple transportation options.

Trip Reductions and Transportation Demand Management (TDM) are a critical component of all development that will take place in this area. The Draft Proffer Statement contains trip reductions that the applicant has committed to achieving. However, the phasing of when the reductions will be met as well as the size of the reductions should be reconsidered as the traffic study and Draft Proffer Statement trip reductions are not consistent. More specific details related to the actual reductions used may be found in the Attachment; however, it is important to note that the reductions assumed in the traffic study were separated into two categories which are synergy reductions and TDM reductions. The traffic study, along with statements in the application, indicates that this development is intended to be mixed-use containing office, retail, hotel, and residential components. The Draft Proffer Statement has no commitment to construct any residential units in any of the three phases. This means the synergy commitments assumed in the traffic study may not be realized in interim phases of development and could



Stephen Gardner, Project Manager  
Loudoun County Department of Planning  
September 10, 2010  
Page 4 of 5

result in more traffic on the road network as all workers would come either from future or existing development near the Route 28 station or from areas outside of the immediate area north of the Dulles Toll Road. The applicant may want to consider committing to residential uses in early phases of development as this can have the added benefit of reducing vehicular trips on the road network and creating a sense of place that is active at all hours of the day.

The concept development plan shows three stops for the shuttle bus system that the applicant has committed to fund and operate. This system can be very helpful by making it more attractive to use public transportation. However, in order for the shuttle bus to provide the most benefit it should serve the entire site, operate during convenient hours including the middle of the day, and be established to serve the first buildings that come online. It appears from the concept development plan that the shuttle bus serves only portions of the development. Shuttle stops along Road A should be considered to serve the south sides of land bays 10-13. Additionally, the shuttle system should also be evaluated to serve Land Bay A or a separate and secure shuttle bus system should be established for this land bay if it is intended to be a secure area with limited access. Studies have shown and the cited WMATA 2005 Ridership Survey (which is used as justification for trip reductions in the traffic study) also verifies that office workers use of a Metrorail facility declines more rapidly than residential the further the building is located away from the station. The use of a shuttle bus system that serves the entire area as well as potential additional transit service from Loudoun, the Fairfax Connector, or WMATA could help alleviate traffic impacts on the surrounding road network.

These comments are provided by the Fairfax County Department of Transportation staff on Loudoun County's applications solely for the purpose of identifying parts of the application where additional information is needed or issues that we believe should be resolved. A recommendation for either approval or denial should not be inferred. These concerns represent staff analysis and do not reflect the opinion of the Fairfax County Board of Supervisors. Thank you in advance for consideration of our comments. If you have any questions please feel free to contact Mike Garcia (tel. 703-877-5673) Michael.Garcia3@fairfaxcounty.gov.

Sincerely,



Leonard Wolfenstein, Chief  
Transportation Planning Section  
Fairfax County Department of Transportation

Attachment: Fairfax County Department of Transportation Detailed Comments 9-10-10

Stephen Gardner, Project Manager  
Loudoun County Department of Planning  
September 10, 2010  
Page 5 of 5

Cc: Sharon Bulova, Chairman, Fairfax County Board of Supervisors  
John W. Foust, Dranesville District Supervisor  
Catherine M. Hudgins, Hunter Mill District Supervisor  
Michael R. Frey, Sully District Supervisor  
Fred Selden, Department of Planning and Zoning (DPZ)  
Marianne Gardner, DPZ  
Kathy Ichter, FCDOT  
Dan Rathbone, FCDOT  
Rick Stevens, FCDOT  
Mike Garcia, FCDOT

## Fairfax County Department of Transportation Detailed Comments (9-10-10)

## Rock Hill Road and Shaw Road

- Reiterating the same comment made in the letter, the newly adopted Comprehensive Plan text for Fairfax County states that Rock Hill Road should be an improved two-lane road and that a new four-lane road should be constructed to the west of existing Rock Hill Road. Given this provision in the Fairfax Comprehensive Plan and the Town of Herndon concerns with widening Rock Hill Road, adding a second left turn lane on westbound Old Ox Road to turn left onto southbound Rock Hill Road (as stated in the Draft Proffer Statement (pg. 13) and in the traffic study) is not a desirable solution. Additionally, Rock Hill Road is currently only a two-lane facility (one lane in each direction) at the intersection of Old Ox Road and Rock Hill Road. Constructing a second left turn lane would require widening Rock Hill Road to two lanes in the southbound direction. As the widening is not the intent of the Fairfax County Comprehensive Plan it is reiterated that this recommended improvement by the applicant is not appropriate.
  - Furthermore, the second left turn lane is to be implemented in the first phase (2015) of development, which means the applicant has assumed that Rock Hill Road has been widened to four lanes. There have been no commitments from Fairfax County and no rezoning applications have been filed to date to indicate that this road is going to be improved in the near future.

## Bridge Over the Dulles Toll Road

- All comments below pertain to the bridge over the Dulles Toll Road remaining on the Fairfax County Comprehensive Plan. The bridge and its associated impacts are currently being evaluated with the Route 28 Station South Side Study. This Study will determine whether the bridge remains on the Fairfax County Comprehensive Plan. The following comments should be considered and perhaps modifications made to the rezoning documents to address these issues.
  - On page 12 of the Draft Proffer Statement the applicant states that they will reserve and dedicate the right-of-way for the construction of the Dulles Toll Road Bridge upon request from Loudoun County and that it shall be funded and constructed by others.
  - Funding for the bridge has not been identified; however, if the bridge is to be constructed funding would be needed from multiple sources including the applicant of DWC. The applicant's own traffic study shows a high volume of vehicles from the site utilizing this bridge. Fairfax County has estimated that the bridge has a capacity of approximately 2,000 vehicles in the peak hour (1,000 per direction). The applicant's traffic study, assumes that 30% of the site vehicles will utilize the bridge (figure associated with pg. 90 of the traffic study). The study also assumes that the site will generate 5,200 vehicle trips (after reductions) during the PM peak hour (pg. 106). If 30% of the site generated traffic uses the bridge and the site generates 5,200 vehicles, then the site generated traffic in the final phase of development that will use the bridge is approximately 1,550 vehicles.

Based on the above calculations and estimated capacity of the bridge, the site would use a little less than 80% of the total capacity of the bridge.

- It would seem appropriate, based on the estimated usage of the bridge by the applicant, that if the bridge remains on the Fairfax County Transportation Plan, and if adopted into the Loudoun County Countywide Transportation Plan, that the applicant may also need to contribute funds for the construction of the bridge to Loudoun County in addition to providing and dedicating the right-of-way to Loudoun County.
- Additionally, the analysis shows six lanes on the bridge over the Dulles Toll Road (pg. 100, intersection #15) in the traffic study. The Fairfax County Comprehensive Plan (pg. 139 of the Upper Potomac Planning District, Area III) shows that this overpass only has four lanes. Fairfax County has no plans at this time to consider a crossing with more than four lanes. Additionally, VDOT's analysis for the inter-jurisdictional effort assumed only four lanes on the bridge. Please correct the traffic study to indicate the appropriate four lanes on the bridge.

#### Phasing of Road Improvements

- The following road improvements were identified in the traffic study as being needed due to traffic generated from the site but were not committed to in the Draft Proffer Statement:
  - 2015 (Phase IA and IB)
    - Traffic signal at realigned Innovation Avenue and Road A/Shaw Road
  - 2020 (Phase II)
    - Traffic signals at Rock Hill Road and Biltmore Drive, Innovation Avenue and Road F, and Innovation Avenue and Road H.
  - 2030 (Phase III)
    - Intersection improvements at Shaw and Old Ox Road
- The following table shows the improvements (highlighted in green and surrounded by a box) that were identified as being needed in the study and included in the Draft Proffer Statement. The improvements are broken into several categories based on those that have been identified as needed due to background growth, identified approved developments in Loudoun County, and development from the recently amended Fairfax County Comprehensive Plan in the Route 28 north area (North County APRs). The table is for comparative purposes; however, only a handful of the identified improvements from the traffic study are being proffered to by DWC. This means that the affected jurisdictions, VDOT, or other developers will be responsible for constructing the improvements listed below, which may not be desirable.



2015	<p><b>Improvements Needed due to Background Growth</b>            One additional WB through lane on Rt. 606 from Rock Hill Road to Shaw Road            Two additional WB through lanes on Rt. 606 from Herndon Parkway to Rock Hill Road            One additional EB through lane on Rt. 606 from Shaw Road to Herndon Parkway            A second left turn lane on NB Herndon Parkway to turn west onto Sterling Road</p> <p><b>Assumed Improvements due to Other Development</b>  <u>Full Interchange at Route 28 and Innovation Avenue</u>            Traffic signal at Rt. 606 and Oak Grove Road</p> <p><b>Improvements Needed due to DWC Site</b>            Traffic signal and intersection improvements at Innovation Avenue and Road A/future Shaw Road  <u>Second left turn lane on WB Rt. 606 to turn south onto Rock Hill Road</u></p>
2020	<p><b>Improvements Needed due to DWC Site</b>            Signal modification at Rt. 606 and Rock Hill Road            Traffic signals at Rock Hill and Biltmore Drive, Innovation Avenue and Road F, and Innovation Avenue and Rock Hill,</p> <p><b>Additional Improvements Needed due to DWC and Partial Fairfax APRs</b>            Traffic signals at Rock Hill and Dulles Green Blvd and Innovation Avenue and Rock Hill Road            Turn lane improvements at Rock Hill Road and Dulles Green Blvd.</p>
2030	<p><b>Improvements Needed due to Background Growth and Fairfax County Old Comp Plan</b>            Connect Davis Drive to Rt. 606 with traffic signal            Right turn lane on SB Oak Grove to turn west onto Rt. 606            Adjust signal timings on Rt. 606            Add second left turn lane on EB Rt. 606 to turn north onto Shaw Road            Add third EB through lane on Rt. 606 at intersection of Shaw Road and Rt. 606</p> <p><b>Improvements Needed due to DWC Site</b>  <u>Connect Shaw Road to realigned Innovation Avenue</u>            At Shaw and Rt 606, Add second left turn lane on WB Rt. 606, right turn lane on NB Shaw, and Convert SB through-left turn lane to through lane only            Signal timing on Rt. 606  <u>Connect Road B to Fairfax County line</u></p> <p><b>Additional Improvements Needed due to DWC and Nominated Fairfax APRS and Bridge</b>  <u>Right-of-way for half of bridge north of the Dulles Toll Road</u>            Improvements at Rt. 606 and Shaw intersection (same as recommended in other phases)            Traffic signal at Rock Hill and Dulles Green Blvd (2020 improvement)            Traffic signal at Innovation Avneue and Rock Hill (2020 improvement)</p>

- The traffic signal at Rock Hill Road and Biltmore Drive that was identified as being needed due to site generated traffic should be provided by the applicant, and included in the final Proffer Statement.

#### Road B – Connection to Fairfax County

- The Draft Proffer Statement (pg. 14) indicates that the applicant will dedicate half of the right-of-way for Road B east of the intersection of Road H and Road B to Rock Hill Road as well as construct half of Road B prior to Phase III. The applicant states that if the road is constructed sooner by others, then the applicant will contribute its share of the costs to Loudoun County. If the applicant's portion of Road B is constructed earlier by others, then the applicant should contribute their share of the Road B construction east of the intersection with Road H and

Road B to the party that constructs the road, not solely to Loudoun County. Additionally, if Road B is constructed earlier in Fairfax County from Rock Hill Road to the county line or Road H, then the applicant should reexamine the possibility of completing the connection to Road A earlier than the Draft Proffer Statement currently stipulates.

#### Route 28/Innovation Avenue Interchange

- The Route 28/Innovation interchange is currently designed as a trumpet style interchange; however, the inter-jurisdictional working group identified a connection from Pacific Boulevard to Innovation Avenue that would connect using the interchange. This connection was examined by VDOT during the inter-jurisdictional effort that included staff from Fairfax County, Loudoun County, the Town of Herndon, and the Metropolitan Washington Airports Authority (MWAA). While this link is not on the Loudoun County Countywide Transportation Plan and would need coordination and approval from MWAA, as it would impact airport land, it was found to help alleviate traffic congestion in the area north of the Dulles Toll Road. This connection should be planned for prior to completing the design and starting construction of the remainder of the Route 28/Innovation Avenue interchange.

#### Transportation Demand Management (TDM) and Trip Reductions

- TDM commitments have been included in the Draft Proffer Statement and in the traffic study. The Draft Proffer Statement indicates that the applicant will achieve a 4% peak hour vehicle trip reduction and submit a TDM Program to Loudoun County prior to Phase II. Upon completion of Phase III, the applicant shall achieve a 10% peak hour vehicle trip reduction.
  - These reductions do not match the total vehicle trip reductions assumed in the traffic study.
    - The first phase (2015) assumes a 5% total reduction (transit and internal) in the traffic study compared to a proffered 4% reduction.
    - The second phase (2020) assumes an 18% total reduction (transit and internal) in the traffic study compared to a proffered 4% reduction. No additional vehicle trip reductions have been proffered to in the second phase of development which assumes the Route 28 Metrorail station has been constructed and is operational. The Draft Proffer Statement even states that the applicant cannot move to Phase II until the Metro station is open.
    - The third phase (2030) assumes an 18% total reduction (transit and internal) in the traffic study compared to a proffered 10% reduction at the completion of Phase III.
  - The traffic study separates internal synergy reductions from TDM reductions but since the Draft Proffer Statement references only a trip reduction, it should include the higher percentage assumed in the traffic study. This seems relevant given the uncertainty of the applicant constructing any residential units on the site as none have been committed to in the Draft Proffer Statement. The traffic study is dependent upon

residential synergy with non-residential uses and if no residential units are constructed, then the trip reduction targets for synergy may not be met and the result could be more vehicle trips in the interim phases of development.

- Additionally, if the pattern of development results in less synergy in the interim and ultimate phases of development, then the Draft Proffer Statement should account for this. Having the higher percentage vehicle trip reduction, which includes components of a TDM program, should help achieve the trip reductions assumed in the traffic study.
- The site is located proximate to the Route 28 Metrorail station; however, most of the site is located beyond a half mile from the station. The applicant utilizes the WMATA 2005 Ridership Survey as a basis for establishing trip reductions. The survey only includes sites that are entirely within a half-mile of Metrorail station. The trip reductions assumed because of transit for development beyond a half-mile from the site may be too high.
- The Draft Proffer Statement indicates that a shuttle bus system will be set up by the applicant to serve the site prior to the commencement of Phase II. The traffic study indicates that as part of the applicant's TDM Program, the shuttle bus service will be operational in Phase I (2015) of the development. In order for the first phase to utilize the shuttle bus system it would be beneficial to establish the shuttle bus system towards the beginning/middle of the first phase. The TDM program also contains a bike/walk element. Without the commitment of residential it would seem that the bike/walk element of this program would be limited in the initial phase of development and could be limited in the subsequent phases as there is no commitment to construct residential units on the site.
  - The shuttle bus stops identified in the concept development plan appear to be arbitrary and do not adequately serve land bays 9, 10, 11, 12, and 13. A shuttle bus stop at the intersection of Road F and Road A may be appropriate to better serve these land bays.
  - Land Bay A does not appear to be served at all by the shuttle bus as no stop has been identified on the concept development plan in that land bay. Since Land Bay A is located the furthest from the planned Route 28 Metrorail station, which the applicant intends to utilize, then serving the site directly with the shuttle bus system could benefit this land bay the most. If the applicant does not want to serve the site with the shuttle bus, then reductions associated with transit should be reevaluated for this land bay.



# County of Fairfax, Virginia

To protect and enrich the quality of life for the people, neighborhoods and diverse communities of Fairfax County

September 7, 2010

Stephen Gardner  
Project Manager  
County of Loudoun Department of Planning  
1 Harrison Street, S.E., 3rd Floor  
Leesburg, VA 20175

SUBJECT: ZMAP 2008-0018 and SPEX 2010-0003  
Dulles World Center Amended Application Referral Request

Dear Mr. Gardner:

Thank you for the notification regarding the Dulles World Center (DWC) Zoning Map Amendment and Special Exception applications. The approximately 82 acre subject site is located in Loudoun County, north of the Dulles Toll Road and is directly adjacent to the Route 28 / CIT Transit Station area, which is located in Fairfax County, and is anticipated to be served by Metrorail by 2016. This application proposes to develop a mix of uses on approximately 60 acres with the PD-TC (Town Center) zoning district and office on approximately 20 acres with the PD-OP (Office Park) zoning district. According to the application, the proposed development includes:

- Up to 3,679,500 s.f. of non-residential development which may include:
  - Office use from 2,443,000 to 3,279,500 s.f.
  - Commercial use up to 400,000 s.f. (no stated minimum)
- Hotel use up to 350,000 s.f. (up to 350 rooms)
- Up to 1,495 multi-family residential units (no stated minimum)

As demonstrated by a recently adopted Plan amendment for the Route 28/CIT Transit Station Area, Fairfax County has a strong commitment to Transit Oriented Development (TOD) near future Metrorail stations. This includes the goals of achieving high levels of transit ridership and accessibility to transit options.

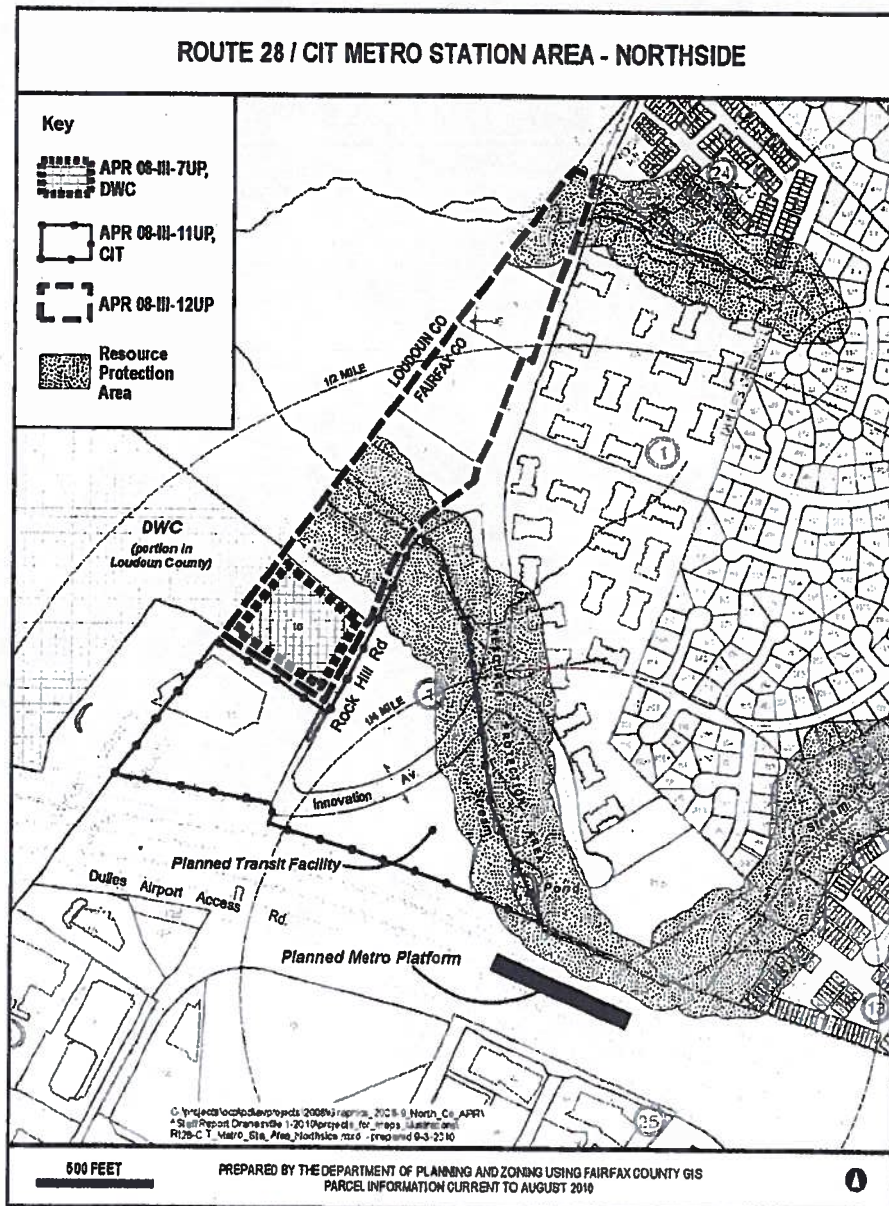
### Goals of Route 28/ CIT Transit Station Area Policy

The Dulles World Center proposal is located adjacent to Fairfax County's Route 28/ CIT Transit Station Area, which was recently the subject of a two year planning study. On July 27, 2010, the Fairfax County Board of Supervisors adopted a change to the Comprehensive Plan to add a higher intensity mixed-use option for TOD at the future Rt. 28/ CIT Metro Station north of the Dulles Toll Road. The adopted transit option locates the Metrorail station entrance pavilion on the CIT property as shown on the figure below and concentrates development closest to the Metro station, creating a critical mass of



pedestrian activity in a core area by supporting mixed use development. The higher intensity is focused within a ¼ mile radius of the Metro station and is to taper down within a ½ mile and beyond. The recommended intensities range from .5 FAR to 2.17 FAR as follows.

- **Within ¼ mile:** 2.17 FAR residential and non-residential mixed-use on approximately 11 acres
- **Within ½ mile:** 1.6 FAR residential and non-residential mixed-use on approximately 30 acres
- **Greater Than ½ mile:** .50 FAR residential use on approximately 4 acres



The following comments recognize the current opportunity to coordinate certain aspects of development on both sides of the jurisdictional boundary. This includes coordination of the development pattern to ensure effective transit-oriented development to reduce vehicle trips and increase transit ridership. Additional information and commitments are requested to address stormwater management and parks and recreation concerns as well. Finally, a chief concern is the need to coordinate the transportation network which includes multiple modes of transportation. The Fairfax County Department of Transportation will provide their comments under separate cover.

### **Transit Oriented Development (TOD)**

#### Transit Accessibility

The Dulles World Center proposal cites proximity to the planned Route 28 Metro Station as a part of the justification for increased development potential and estimated trip reductions. The station is scheduled to be completed mid to late 2016. Approximately 13 of the total 82 acres of the Dulles World Center proposal are within ½ mile radius from the Route 28 Station platform, which means the majority of the site is beyond a convenient walk to the Metro station. These more distant locations in DWC would benefit from an effective bus or circulator system to achieve increased transit ridership. The DWC proffers include a commitment for a shuttle bus that would come on line during Phase II of development and serve three stops on weekdays for 2 ½ hours in the morning and afternoon. A commitment to provide all day bus or circulator service that conveniently served the entire site would result in a bus or circulator system that effectively increased the site's transit ridership. Providing such service in the early phases of development would put in place the transit choice for the first 1.4 million square feet of office development. When future development in this area occurs, both in Loudoun and Fairfax County, there will be an opportunity for others to expand the system established by DWC, thus making transit options convenient and reducing vehicle trips in this area. In addition to an effective bus or a circulator system, DWC has the opportunity to establish a grid pattern of streets, interconnected sidewalks, trails and bicycle routes that should be connected to surrounding areas in Loudoun and Fairfax County.

#### Mix of Uses

One of the DWC concepts is to focus pedestrian activity around a town green and civic uses. One key measure of a successful town center is the pedestrian activity that is generated by the mix of uses and design of the pedestrian realm. Providing a mix of uses and minimizing the separation of residents, workers and services encourages people to go about their day without additional vehicle trips. The applicant's draft proffers indicate that specific levels of office development are needed in order to proceed to subsequent phases of development. Without similar commitments to residential and ground floor retail or commercial service uses there is no assurance that the land uses will activate the public spaces or result in a pedestrian oriented development. A balance of residential and

non-residential uses during interim phases of development is critical to activate pedestrian areas 18 hours a day and further encourages people to walk. Similarly, ground floor retail or service uses encourage pedestrian activity and are critical components of pedestrian oriented development. [Additional comments about the role that residential uses have in optimizing the transportation network are included in FCDOT comments.]

### Urban Design

The DWC town center concept provides an opportunity to concentrate pedestrian oriented development and carefully design the pedestrian environment. A key component to the success of the town center rests in the effectiveness of the urban design to induce people to choose to walk throughout their day and not choose vehicle trips. Many of the qualities of pedestrian oriented development are featured in the DWC Design Guidelines that are to be used by future land owners to guide their design. The guidelines refer to a network of public plazas and parks, streetscape design, landscape and building design. However, there isn't any evidence in the Concept Plan or proffers that there are specific commitments to these guidelines. Including specific urban design commitments would provide assurances that a vibrant pedestrian-oriented mixed use development will occur on the site.

For instance, the design guidelines discuss provision of outdoor dining, sidewalk cafes and pedestrian connections to significant destinations and other public ways. There is no commitment made to the location of the pedestrian paths other than sidewalks around large blocks that are primarily 3 to 5 acres in size. The proffers indicate that blocks that are longer than 500 feet will have mid-block breaks, which may include a plaza, pocket park or alley, to break-up the "linear massing of the block". A commitment to provide mid-block through pedestrian connections would not only achieve a break in the building mass, but would make the development more hospitable to pedestrians.

### **Parks and Recreation**

A key component to the quality of life for people in this area is the provision of parks and recreation services. As this large undeveloped area is being planned to include more of an urban type of development, there is an opportunity to provide public open space and active recreation facilities.

### Open Space

Open spaces provide places for people to enjoy passive and active leisure pursuits and can serve the needs of residents, visitors and employees in the area. The DWC Plan and proffers include a commitment to set aside 8.54 acres of open space or about 10% of the total site area. However, the current proffers allow for the condition where the open space in Land Bay A may be restricted from public access in the event that Land Bay A is sold or leased to a government agency and/or defense contractor. Such exclusion would leave



the remaining 1.34 acres of committed open space to serve the 59.82 acres of the PD-TC zoned portion of the site. This would mean that 2.2% of the PD-TC zoned area would be the only open space provision for up to 1,495 residential units, up to 2,279,500 square feet of office; 350,000 square feet of retail; 350,000 square feet of hotel space as well as civic uses. Additionally, plan notes and proffer language are ambiguous as to the quality of this limited open space. Plan notes indicate that a portion of the Town Green may contain retail shops. Proffers indicate that civic uses may be included in this area. A clear understanding of the commitments to publicly accessible open space and outdoor recreational facilities is needed, otherwise there is no evidence that it is adequate to serve the needs of the development.

#### Recreational Needs

In addition to concern regarding the overall provision of open space, there are similar concerns regarding the limited commitment to the provision of on-site recreational facilities. These would provide residents and workers safe and accessible recreational options. Current proffers speak to the provision of trails, at least one gazebo and at least three picnic tables in Land Bay A. The provision of facilities does not adequately offset demand that would be generated by the proposed development, particularly as proffers speak to the potential for this area to be restricted from public access.

Other proffers listed under "Recreational Amenities" include a commitment to 500 square foot residential courtyards, bicycle storage, swimming pools and interior amenity space. The provision of the limited residential courtyards is more applicable to open space and does not address recreational needs. Bicycle storage also does not address recreational needs. The commitment to pool size seems quite small in comparison to the overall development size. The commitment to 7,500 square feet of interior amenity space allows for a fitness center or yoga/pilates room but also allows for this space to be developed as a business center or community room. The latter options would not address recreational needs. There is commitment that at least one fitness center will be available to residents; however, this does not address any need generated by the future workforce or hotel patrons. Furthermore, current proffers speak to the possibility that development of a private fitness facility on-site would relieve the applicant of the responsibility to provide such a facility. There is no commitment to the true availability or affordability of such a membership to all future residents.

Of particular note is that there are no athletic fields to serve the proposed development. The Third Referral Comment Response Letter from the applicant, dated July 30, 2010, refers to meeting the future development's need for outdoor recreation at Claude Moore Park; however, there is no commitment to improve or provide additional facilities to offset the additional demand. Located approximately 3.5 miles from the site, Claude Moore Park would be beyond the immediate service area of the site by Fairfax County standards. It is critical that developments of this size and land area provide adequate open space and land for active recreation. For example, two approved mixed use



developments in Fairfax County south of the Metro station, Dulles Station and Arrowbrook, have provided significant commitments for open space and active recreation. The 63 acre Dulles Station development will provide 23% open space and land for a full size soccer field while the 54 acre Arrowbrook development has 35% open space and 7 acres for active recreation to include a lit, synthetic turf field, picnic pavilion/restrooms, community stage, tennis courts, basketball court, play ground, bocce ball, and preservation of a historic home.

The proposed development plan should be carefully evaluated in its required commitment to address the open space and recreational needs of the future residents, workforce and guests of the proposed development. The plan and proffer commitments should be revised to demonstrate provision of adequate open space to perpetually serve all residents and workers. A reasonable balance of recreational facilities, including a commitment to athletic fields, should be provided as well. The nature and intensity of such a mixed-use development offers opportunities to creatively address the demand. Likewise, impacts to both Fairfax and Loudoun County parks should be evaluated and a commitment made to offset impacts.

As the broader area develops, provision of open space and park services by both Loudoun County and Fairfax County will be needed to keep pace with the needs of area residents, workers and visitors. There may be opportunities in the future to cooperatively work toward providing these services and coordinating open space and park amenities.

### **Stormwater Management**

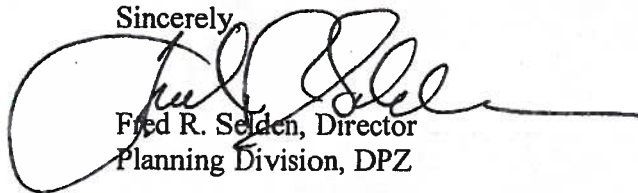
Land use and development activities have the potential to degrade the ecological quality of streams through the direct transport of pathogens and pollutants, as well as through hydrologic changes that can alter the character of flow in streams, resulting in alterations to stream morphology (e.g., stream bank erosion). The protection and restoration of the ecological quality of streams is important to the conservation of ecological resources. Consideration of stormwater management commitments at this stage of development would provide assurances toward that end. Predevelopment conditions for the site include approximately 75 acres of undeveloped land. This development will dramatically transform the area resulting in increased runoff, some of which could impact Fairfax County. Outfall adequacy has not been provided either in a narrative or depiction of drainage areas. Additional information regarding adequate stormwater outfall is necessary to determine the impacts to Fairfax County.

**Closing Comments**

Thank you for the opportunity to comment on the revised submission of the Dulles World Center proposal. This presents an opportunity for Fairfax County and Loudoun County development to have coordinated design and access that optimizes the use of planned transit and the planned roadway network, as well as promote the creation of a sustainable and livable community.

Fairfax County Department of Planning and Zoning and Fairfax County Park Authority staff provide comments on Loudoun County's applications solely for the purpose of identifying issues that we believe need to be resolved. A recommendation for either approval or denial should not be inferred. These concerns represent staff analysis and do not reflect the opinion of the Fairfax County Board of Supervisors. Thank you in advance for consideration of our comments. Please call Clara Quintero Johnson of my staff at (703) 324-1380 if you have any questions.

Sincerely,



Fred R. Selden, Director  
Planning Division, DPZ

FRS/CQJ

O:\2008\_North\_County\_APR\Dranesville\Nomination\_Files\CIT\_Rock\_Hill\_Rd\Interjurisdictional\_Coordination\Loudoun County\DW2008 submission\Final DW2008 comment letter  
September\_3\_2010

cc: Sharon Bulova, Chairman, Fairfax County Board of Supervisors  
John W. Foust, Dranesville District Supervisor  
Catherine M. Hudgins, Hunter Mill District Supervisor  
Michael R. Frey, Sully Supervisor  
Sandy Stallman, Fairfax County Park Authority  
Marianne Gardner, Department of Planning and Zoning  
Leonard Wolfenstein, Department of Transportation  
Clara Quintero Johnson, Department of Planning and Zoning

**This page is intentionally left blank.**



September 1, 2010

Mr. Stephen Gardner, Project Manager  
Loudoun County Department of Planning  
1 Harrison Street, S.E., 3<sup>rd</sup> Floor  
P.O. Box 7000  
Leesburg, VA 20177

RE: ZMAP 2008-0018 & SPEX 2010-0003;  
Dulles World Center



Dear Mr. Gardner:

Thank you again for the opportunity to comment on the above referenced Zoning Map Amendment and Special Exception. The Authority's previous comments recommended that the developer, consistent with Loudoun's Zoning Ordinance requirements with regard to the Airport Impact Overlay District, secure notification from the Federal Aviation Administration (FAA) that the project is not a hazard to air navigation. The developer has filed FAA Form 7460-1, Notice of Proposed Construction or Alteration, and received a Notice of Presumed Hazard for the proposed development. Through conversations with the local FAA Airports District Office it is our understanding that the Presumed Hazard determination is based on impacts to existing navigational aids that serve Runway 19L. We have also learned that the developer is currently in the process of conducting an independent evaluation of these impacts through the services of Ohio University. The Authority would request that this issue be tracked through the planning review process and that Loudoun County not allow development to proceed until the developer receives a Determination of No Hazard for the proposed development.

Thank you for the opportunity to comment. If you have any questions or need additional information, please feel free to call me at (703) 572-0261 or Mike Hines at (703) 572-0262.

Sincerely,

William C. Lebegern, P.E.  
Manager, Planning Department

WCL:pp

ATTACHMENT 1q



**This page is intentionally left blank.**